



June 10, 2022

[Electronically Submitted to: Amendment 17 Online Form]

Re: Amendment 17 – Canada Gazette, Part I

Dear [Insert Name]:

On behalf of Bradford White Corporation (BWC), thank you for the opportunity to comment on the pre-publication of Amendment 17 in the Canada Gazette, Part I. Please see below for our comments, which are specific to the proposed amendments to the efficiency standards for commercial water heaters.

Electric Storage Water Heaters

BWC supports Natural Resources Canada (NRCan) for aligning the standby loss requirements for electric storage water heaters up to 140 gallons with the requirements set by the U.S. Department of Energy (DOE).

Regarding the test standard referenced for these products, we believe that it is not accurate and too general. Rather, BWC recommends that NRCan should reference “10 CFR Part 431, Subpart G Appendix B” for (commercial) electric storage water heaters.

Gas Storage Water Heaters

BWC recommends NRCan change the volume term in the Uniform Energy Factor (UEF) and standby loss formulas for these products. Instead of what was pre-published, we believe the terms should be V_r instead of V_s . This would better align with U.S. DOE regulations, which we believe was NRCan’s intent in Amendments 14 and 15 where these products were regulated. For reference, we’ve attached our recommendation for the formulas.

Regarding the test standard referenced for these products, we believe that it is not accurate and too general. Rather, BWC recommends that NRCan should reference “10 CFR Part 431, Subpart G Appendix A” for (commercial) gas storage water heaters.

For models greater than 140 gallons, we recommend that NRCan set one standard of a minimum 80% Thermal Efficiency to align with U.S. DOE requirements, especially given that they make-up a limited portion of the commercial water heating market. However, if NRCan is unwilling to set a single standard for greater than 140 gallons, BWC recommends NRCan set separate requirements for new construction versus replacement applications that these models go into. This would be consistent with the standards set by NRCan for models that are 140 gallons or less.

Bradford White Corporation thanks you for this opportunity to comment on Amendment 17 in the Canada Gazette, Part I. We have coordinated our response with CIPH and AHRI.

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Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
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Cc: R.B. Carnevale; B. Hill; T. Gervais; M. Williamson; L. Prader; C. VanderRoest; C. Sanborn; J. Robertson; K. Doyle; B. Wolfer; R. Suppa; D. Hughes; K. Bergeron;

Attachment(s):
Recommended changes to UEF and Standby Loss Formulas

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