



August 12, 2016

Ms. Ashley Armstrong
U.S. Department of Energy
Building Technologies Program, MS EE-5B
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0121

Re: NOPR for Test Procedure for Commercial Water Heating Equipment
Docket No. EERE-2014-BT-TP-0008 – Supplemental comments following ex-parte meeting

Dear Ms. Armstrong:

Thank you for your time and listening to our discussion during the ex-parte meeting held July 18, 2016. We submit the following supplemental comment in response to the Notice of Proposed Rulemaking (NOPR) on the efficiency test procedure for commercial water heating equipment issued in the May 9, 2016 Federal Register (81 FR 28588).

Flow-activated instantaneous water heaters (FAIWH) engineered for use in Emergency Eyewash and Drench Shower applications

It is Bradley's recommendation that the department exclude these products as they are engineered for a specialty worker health and safety application. These products have specialty features that are physically recognizable as well as controllers that are factory limited and not user adjustable and set at 80°F.

These units are physically identifiable by an electronically activated mechanical purge system, figure 1, that will release water from the heater when the temperature exceeds 95°F and then close when the heater is below 95°F. Along with surface mounted bi-metal thermostats with manual resets that terminate the heating operation at 100°F. As a result of these specialized systems that protect a user from scalding during the use of an emergency eyewash or drench shower in a workplace emergency, the units are also rendered unusable in other applications such as general water heating or domestic water needs.

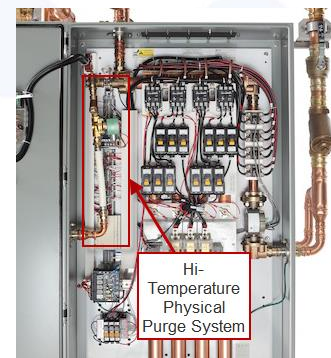


Figure 1: FAIWH with over temperature physical purge system



As these units constitute a small portion, less than 0.3%, of the commercial water heater market and are only activated for testing and in an emergency, these units represent a minimal impact to the nation's energy consumption. Therefore Bradley requests that these Flow-activated instantaneous water heaters engineered for use in Emergency Eyewashes and Drench Showers be exempted from the test procedure.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Nathaniel Kogler".

Nathaniel Kogler
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