

ATTENDEES:

Ashley Armstrong, DOE

Laura Barhydt DOE

Eric Stas, DOE

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Mark Taylor, Bradford White Corporation

Adam S. Olsen, Sconset Strategies, LLC on behalf of Bradford White Corporation

MEETING DATE:

Tuesday, March 24, 2015

SUBJECTS DISCUSSED:

Notice of proposed rulemaking establishing a mathematical conversion factor for consumer water heaters and certain commercial water heaters, specifically:

- 1.) NOPR release date and the burden manufacturers will incur with the condensed timeline
- 2.) Concerns with the implementation timeline difference between the use of the UEF and the FTC labeling change. Manufacturers will not be compliant with either DOE or FTC because of this timeline difference
- 3.) Potential for enforcement relief because of the timeline difference noted above
- 4.) Potential for negative impact on development of new, energy efficient products because the conservation standards are in EF, yet requirement is to use UEF after 7/13/15
- 5.) Potential to reduce the energy conservation standards and violate “anti-backsliding” provisions, or make the conservation standard more stringent by determining the new conservation standard as a UEF by applying the conversion factor to the current EF