**Questions for NRECA Members –**

**Consumer Water Heater Energy Conservation Standard Proposed Rule**

**Available here:** [**https://www.federalregister.gov/documents/2023/07/28/2023-15306/energy-conservation-program-energy-conservation-standards-for-consumer-water-heaters**](https://www.federalregister.gov/documents/2023/07/28/2023-15306/energy-conservation-program-energy-conservation-standards-for-consumer-water-heaters)

1. What gallon size water heater do you recommend for residents in your territory, if any? What data points do you use to make that recommendation? (square footage of home, # of occupants, etc.)
2. What gallon size water heaters are eligible for rebates that your cooperative currently offers to consumer-members?
3. Do you have an existing demand response program that utilizes residential water heaters? If not, are you actively planning to implement one?
4. Are there any new use cases your cooperative is considering with respect to the use of water heaters for demand response?
5. What gallon size water heaters are eligible for use in your existing load control/demand response programs?
6. Does the lower overall energy demand projected by the Department of Energy for heat pump water heaters (HPWH) compared to electric resistance water heaters offset any concerns your cooperative would have in potentially losing your water heater demand response/load control program?
7. Do you have data on the energy savings that consumer-members experience when switching from electric resistance water heaters to HPWHs? What is the difference in potential kW to shift between the two?
8. Does this rule cause you concern for members with dual-fuel needs due to cold climate?
9. Does your existing demand response program incorporate heat pump water heaters today?
10. Do you find there are available models of heat pump water heaters on the market that meet your cooperative’s needs for demand response?
11. Are you/your consumer-members adding new grid-enabled water heaters to your system (>75 gal models)? As you may recall, [grid-enabled water heaters](https://www.law.cornell.edu/definitions/uscode.php?width=840&height=800&iframe=true&def_id=42-USC-618202220-1947707430&term_occur=1&term_src=title:42:chapter:77:subchapter:III:part:A:section:6295) must meet a specific definition, as we secured in legislation here: <https://www.electric.coop/co-ops-cheer-house-action-water-heater-efficiency-legislation>
12. Please describe any impacts your system has experienced when consumer-members have adopted electric tankless water heaters.
13. Consider the contractor (plumber/electrician) base in your local area that would be required to install heat pump water heaters. Do you have concerns about the availability of licensed contractors available to serve residential consumer needs for water heater replacements in your area?
14. Do you have experience supporting consumer-members with heat pump water heater installations in any of the following: cold climate, manufactured home and/or tight spaces?
15. Do you have any information on the range of installation costs your consumer-members have experienced with heat pump water heaters in your service territory?
16. Do older homes make up the majority of your residential load? Do you have specific concerns about the installation of heat pump water heaters in older housing stock? Please elaborate on any installation challenges you have experience with.
17. What percentage of your residential load comprises manufactured housing?
    1. Do you have experience with installations of heat pump water heaters in manufacturing housing units; what was your experience?
    2. Generally, what are the gallon sizes of water heaters you see installed in manufactured housing units in your territory?
18. For your consumer-members installing heat pump water heaters today, are you familiar with examples where the homeowner is electing to operate them in “electric resistance mode” only versus heat pump? Please elaborate if possible.
19. Do you support connectivity requirements (such as [CTA 2045](https://www.cooperative.com/topics/distributed-energy-resources/Pages/Standardized-Communications-for-Demand-Response.aspx), or [AHRI 1430](https://www.ahrinet.org/search-standards/ahri-1430-i-p-demand-flexible-electric-storage-water-heaters)) for new water heaters, regardless of whether they are using electric resistance or heat pump technology?
20. Would you support this proposed standard from DOE if it applied to new construction only (i.e. all new homes constructed from 2029 and on would be equipped with HPWH)? Are there other improvements to the rule we should consider?
21. We’re not currently planning to comment on aspects of the proposal that pertain directly to gas water heaters. If you have any concerns with this specific part of the proposal, please explain impacts to your cooperative here.
22. Please share any data or information you may have to help explain the importance of existing water heater demand response programs in meeting your cooperative’s current and future clean energy goals. This may also include details on the benefits of your broader efficiency program offerings to your consumer-members. (i.e., Does the load-shifting help lower reliance on natural gas peaking generation?)