

Duane:

Thanks for the quick response and guidance on how to provide feedback. Here is a bullet point summary from Bradford White Corporation (BWC):

- Adoption of 2018 Seattle Energy Code adds the following regulation to Table C404.2(h), which states:
h. Unfired storage tanks used to store service hot water at temperatures above 130°F shall include a minimum of R-4 additional insulation for every 10°F increase in stored water temperature above 130°F. See Attachment A for reference
- BWC respectfully requests that Note (h) be stricken from Table C404.2
See Attachment B for reference

BWC alerts the City of Seattle to this note, as states and locales are prohibited from imposing more stringent efficiency requirements for U.S. Department of Energy (DOE) covered products. The following bullet points elaborate more on this point:

- The Energy Policy and Conservation Act (EPCA) authorizes DOE to regulate the energy efficiency of a number of consumer products and industrial equipment.
- Under EPCA, energy efficiency thresholds cannot be more stringent than the requirements established by DOE.
- Unfired hot water storage tanks are a federally regulated equipment covered by EPCA.
- The minimum energy efficiency standards for unfired hot water storage tanks is R-12.5
See Attachment CFR-2020-title10-vol3-sec431-110.pdf

BWC recommends the change prior to adoption for the following reasons:

- Avoid significant violations of preemption provisions contained in EPCA;
- Harmonizes the Seattle Energy Code with energy efficiency requirements of both ASHRAE 90.1 and the International Energy Conservation Code (IECC); and
- Avoids confusion in the field for plumbers, contractors, and inspectors.

Thank you for including BWC in the City of Seattle's codes and standards discussions. Bradford White Corporation will provide a more formal letter detailing the bullet points in this summary. Please let me know if you have any questions.

Respectfully Submitted,

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