**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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Recommend a definition of “water heater” be added to accompany the HPWH and iHPWH definitions. Other product types have a definition, so water heaters should probably as well. Proposed definition is from IECC 2024.

Recommend adding a definition of “split-system heat pump water heater (sHPWH).” sHPWH’s typically have the heat pump installed outdoors, but there could also be installed indoors. The separate storage tank will typically be installed indoors, with refrigerant or water lines running through the house. Further, provisions should be added through the standard to account for the energy use parameters for sHPWHs; including, but not limited to, adjustment of efficiency based on ambient temperature (outdoor or indoor), adjustment of efficiency based on supply water temperature (to the household) and HP inlet temperature (from the tank to HP), piping insulation (from HP to tank), and standby losses of the tank.

**Proposed Change to the Draft Standard\***  
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*

*Use a color other than red to indicate proposed changes to the draft.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

***Water Heater*** – Any heating appliance or equipment that heats potable water and supplies such water to the potable hot water distribution system.

**Split-System Heat Pump Water Heater (sHPWH)** – An air-source Heat Pump Water Heater where the air-source heat pump is separate from the storage tank.