**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Dear RESNET Standards Committee,

On behalf of Rinnai America Corporation, we appreciate the opportunity to comment on the proposed changes to heat pump water heater (HPWH) installations and ratings. We recognize the committee’s significant effort in developing these proposals and understand that our comments come at a late stage, as the committee moves toward finalization. Nevertheless, we believe it is critical to raise the following concerns.

While we commend RESNET for focusing on the important goal of improving HPWH installations to enhance performance and efficiency, Rinnai opposes the proposal as currently drafted for several key reasons:

Misalignment with Installation Standards
The proposed conditions — including increasing the minimum enclosed room volume from 700 ft³ to 1,000 ft³, requiring a net free air exchange area of 75 in² per 100W of compressor power, and mandating ducted intake/exhaust — do not align with Rinnai’s established product installation standards.

We invest significant time and resources to ensure our products are installed correctly to deliver optimal performance, reliability, and safety. A misalignment of this scale, even if well-intentioned, risks undermining those efforts. At best, it could compromise product performance; at worst, it could impact safety, efficiency, or longevity.

Divergence from Established Efficiency Metrics
The proposal’s method of back-calculating COP from UEF and separately modeling tank performance departs from long-established industry and regulatory practices — particularly the federally mandated efficiency metrics under DOE 10 CFR 430, which evaluate the system as a whole. Introducing conflicting metrics risks confusion among manufacturers, builders, and inspectors.

We also flag a potential error in the text: *“For all other Hybrid iHPWH installations, the maximum allowable COP (COPeff) shall be determined by the equation below.”* - Should this instead refer to the minimum allowable COP?

Risk of Unintended Market Consequences
Several aspects of the proposal are highly complex and likely difficult to enforce in the field. The inclusion of numerous — sometimes intricate — equations risks deterring adoption rather than promoting it, while making enforcement especially challenging for inspectors and builders.

In our field experience, whether in installation, inspection, or servicing, the simpler and more foolproof the process, the better the outcome. Overly complicated requirements increase the likelihood of misinterpretation, inconsistency, and unintended barriers, ultimately undermining the shared goal of advancing energy-efficient HPWH use.

Urgent Need for Broader Industry Engagement
While we oppose the proposal in its current form, we are eager to work with RESNET to help shape a solution that is enforceable, effective, and widely supported. We respectfully request additional time for industry collaboration to ensure the final standard is technically sound, practically achievable, and aligned with national energy goals.

We also note that parallel efforts are already underway — notably through ASHRAE 90.1 SSPC, which is working closely with manufacturers on HPWH requirements. We strongly recommend that the RESNET Standards Committee engage with AHRI to connect directly with the manufacturers who design and produce these products. Broad, coordinated industry involvement is essential to the development of meaningful and enforceable standards.

In summary, we appreciate RESNET’s attention to strengthening HPWH installation practices but believe the current proposal requires significant revision before implementation. We look forward to collaborating toward a balanced, practical solution.

Thank you for your consideration.

Sincerely,
Marc Neufcourt
Director, Regulatory & Government Affairs
Rinnai America Corporation

**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.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

We respectfully request that all proposed changes associated with Amendment 77 be withdrawn until the industry is given a full and fair opportunity to review and provide input.