



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

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March 20, 2020

Shannon Corcoran
Air-Conditioning, Heating, and Refrigeration Institute
2311 Wilson Boulevard, Suite 400
Arlington, VA

Via email

Re: Request to Establish Label or Marking Requirements for Electric Storage
Water Heaters under WAC 194-24-180(6)

Dear Ms Corcoran:

Thank you for the proposal of March 6, 2020, regarding label or marking requirements for electric storage water heaters. The Department of Commerce appreciates the prompt attention of the water heater manufacturing industry to the implementation requirements of Washington's water heater standard.

In response to AHRI's request, I am attaching a regulatory advisory establishing a label or marking requirement for electric storage water heaters that are subject to Washington Administrative Code 194-24-180. This requirement is a modified version of the AHRI proposal and reflects our consideration of stakeholder comments on the AHRI proposal.

The approved label or marking requirement supports AHRI's objective of establishing a compliance label that is not specific to any individual state. Commerce also supports the concept expressed by a number of commenters of developing a label that assists in marketing demand response capabilities to end users. However, this concept is outside the purpose of the rule provision, which is to assist in determining compliance with the specific design requirement.

AHRI requested that the label or marking requirement anticipate the approval of some additional communication interface standard as equivalent. We are not including this in the approved label and marketing requirement, because no such alternative standard has been proposed or adopted. It would be appropriate to include a proposed label or marking requirement should AHRI or another stakeholder propose an alternative standard.

Finally, the approved label and marking requirement includes a provision concerning the legibility and visibility of the label or marking. This addresses a concern raised by some commenters, and the

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requirement advances a concern expressed earlier by AHRI that products be readily identifiable as compliant.

Please let us know if you have any questions about this action.

Sincerely,

Glenn Blackmon, Ph.D.

Manager, Energy Policy Office