

1 **I. IMPROPER TREATMENT OF AND TRANSITION OF EXISTING**
 2 **RENTAL CUSTOMERS**

3 **Q. Mr. Cebulko claims that in its existing rental service PSE “continues to**
 4 **comply with the Commission’s order to install water heaters with an efficiency**
 5 **of at least 0.6.”⁴⁵ Is this accurate?**

6 **A.** Yes. In fact, on April 15, ~~2015~~2016, the National Appliance Energy Act went into
 7 effect requiring all manufactures to produce products that meet increased
 8 efficiency standards, see figure 3 below.

9 **Figure 3: National Appliance Energy Act Standards**

GAS		Up to 55 Gallon Capacity			Greater than 55 Gallon Capacity		
Rated Storage Vol. (Gallons)	Tankless	30	40	50	60	65	75
Current Standard	.62	.61	.59	.58	.56	.55	.53
2015 Standard	.82	.63	.62	.60	.75	.75	.74

ELECTRIC		20-55 Gallon Capacity			Greater than 55 Gallon Capacity		
Rated Storage Vol. (Gallons)	20	30	40	50	65	80	120
Current Standard	.94	.93	.92	.90	.88	.86	.81
2015 Standard	.95	.95	.95	.95	1.98	1.97	1.92

Standards apply to U.S. only.

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11 PSE has worked with its existing distribution and installation partners to
 12 ensure that rental equipment being replaced is done so with equipment that meets
 13 or exceeds these standards.

⁴⁵ Cebulko, Exh. No. ____ (BTC-1TH) at 16:10-11.