

## Tennessee Rule Case Request

### Water Heater Clearances

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Inquiry: Is it permissible for cylindrical storage water heaters with inputs of less than 400,000 btu/h to be installed with zero clearance on one side and at least one and one-half (1-1/2) feet between all other sides of the vessel where:

- The shape permits visual inspection of the entire outer surface of the water heater;
- The manufacturer's recommended minimum clearances are met; and
- All other clearance requirements as set forth in Tennessee Case BC98-03.

Reply: Yes.

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Statement of Need: A. O. Smith is requesting a ruling by the Tennessee Board of Boiler Rules to allow water heaters and hot water supply boilers that are designed for zero clearance on at least one side to be exempt in part for the installation clearance requirements of Rule 0800-3-3-.04(13).

#### Background:

There are a variety of water heaters and hot water supply boilers that are designed to be installed with zero clearance on one or more sides as specified in the installation instructions and rating labels.

Storage product with cylindrical jackets, allow all visual inspection of all surfaces even when installed with zero clearance on one side.

Tennessee Case BC98-03 allows for one and one-half foot clearance for vessels similar to those covered in this requested Case.

Tennessee Case BC06-23 allows wall-mounted water heaters to be installed with zero clearance on the back side while all other water heaters must have an 1-1/2' or 3' clearance behind them. This inconsistency incentivizes the installation of wall-mounted water heaters versus non-wall mounted products that may have larger floor space needs but provide the same utility to the customer.

The proposed case (and relief sought) will permit maximum flexibility to consumers and installers, remove a regulatory incentive that is impacting market competition and maintain the ability of inspectors to complete thorough observation and inspection of the appliances.