From: Ranfone, Jim [mailto:JRanfone@aga.org]
Sent: Friday, September 09, 2011 4:44 PM
To: Waterheaters@energystar.gov
Subject: AGA Comments on the Energy Star Proposed Eligibility Criteria Version 2.0: Draft 1

In the absence of any energy conservation justification peer reviewed and verified information, the American Gas Association does not support the inclusion of Point-of Use (POU) electric water heaters in the Energy Star program for residential water heaters. Currently federal law has a minimum efficiency requirement for electric Tabletop Water Heaters that first appeared in the January 17, 2001 residential water heater final rule to address concerns from manufacturers for the replacement market for this type of small electric storage water heater. This definition is now being proposed; (less than 36 inches high, 25 inches deep and 24 inches wide) for POU water heaters. We do not believe it was the intent of the DOE to include what appear to be electric instantaneous type water heaters in this definition. Specifically, by this definition virtually any instantaneous electric water heater (inputs less than 12kW) with an EF ≥ .97 will be eligible for Energy Star. While there may be merit in these types of applications for some installations, they should not be recognized as an Energy Star product just as for example, electric space or wall heaters are not considered Energy Star energy saving products. There is no extra ordinary energy design options required for the electric POU water heaters to meet the EF of ≥ .97 that is easily attainable within the tolerances in the water heater test procedure. There are also no assurances that the POU water heater will be installed near the fixture.

In summary, to help ensure the continued creditability of Energy Star products, EPA needs to reassess the inclusion of electric POU water heaters and their contribution to energy and water conservation and inclusion into the Energy Star program.

Jim Ranfone | Managing Director, Building Energy Codes and Standards
American Gas Association
400 North Capitol St., NW | Washington, DC 20001
P: 202.824.7310 |F: 202-824-9120| jranfone@aga.org

The American Gas Association represents 201 local energy companies committed to the safe delivery of clean natural gas to more than 64 million customers throughout the nation.