

May 31, 2007

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Richard / Josh;

Provided below are comments from Applied Energy / ETECH on the proposed standards for Heat Pump Water Heaters.

COMMENTS;

1. THE PROPOSED FIRST HOUR RATING OF 50-GALLONS WHILE INTENDED TO INSURE THAT THE HOMEOWNER NEVER RUNS OUT OF HOT WATER IS NOT IN KEEPING WITH THE FINDINGS OF PREVIOUS PROGRAMS. FOR EXAMPLE; THE EPRI TEST BY DR. CARL HILLER AND OTHERS, AND THE EXTENSIVE ANALYSIS ESTABLISHED THAT A NOMINAL 6,000 BTUH HEAT PUMP WAS OPTIMUM, BUT STORAGE WAS KEY. WATER CONSERVATION IS ALSO KEY, THE LARGER THE HEAT PUMP THE MORE INTRUSIVE IT IS TO THE INDOOR LIVING ENVIRONMENT, NOISE, FREESPACE REQUIRED, ETC.

2. THE REQUIPMENT FOR A 135DEG F TANK IS COUNTER TO THE 120 DEG F TANK TEMPERATURES THAT HAS BEEN TOUTED FOR YEARS BY DOE AND OTHERS. VERY LITTLE CHOICE OF REFRIGERANT IS AVAILBLE TO THE DESIGNER IF HE MUST MEET THIS TEMP WITH A RESIDENTIAL HEAT PUMP.

3. FINAL COST TO THE END CONSUMER FOR A UNIT WITH THESE STANDARDS WOULD CREATE NO INCENTIVE TO PURCHASE SUCH A SYSTEM.

Best regards,

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