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Creating an Energy-Efficient World

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July 12, 2007

Mr. Richard H. Karney, P.E.
Manager, Energy Star Program
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear Mr. Karney:

Earlier this year the Department of Energy began the process of establishing Energy Star criteria for residential water heaters. The Alliance to Save Energy applauds this effort as an important step toward increasing the energy efficiency of American homes.

An Energy Star label provides consumers with important information about a product that helps consumers make smart energy choices. And, given the significant percentage of home energy use represented by water heaters and the long, anticipated life of such products, it is imperative that consumers receive information that will allow them to make the most cost-effective, energy efficient choice when making a purchase. Water heating represents between thirteen and seventeen percent of residential energy consumption, making it the third largest energy use in the typical home. Every home has a water heater, it is used daily, and most heaters are replaced every 7-15 years, making it a likely purchase in the lives of most American homeowners.

Public trust in the Energy Star label is vital to the current and continued success of the program. DOE must develop rigorous criteria, and then review and revise those criteria regularly, to insure the continued integrity of the label. As the Department has recognized, there are innovative and highly efficient technologies, like tankless or "on-demand" water heaters widely available in the market today and these technologies should be considered when establishing the labeling criteria for residential water heaters.

We encourage the Department to move forward expeditiously as consumers are facing ever-increasing energy costs and providing them with information on how they can save energy and money benefits not only the consumers, but the country as a whole in terms of energy security and an improved environment.

Sincerely,

Kateri Callahan