

Nov. 26th, 2007

Dear Mr. Rich Karney and Mr. Josh Butzbaugh,

We have reviewed GAMA's comments regarding the U.S. Department of Energy's (DOE) Second Draft Criteria Analysis for Energy Star Residential Water Heaters and support their suggestions.

We too are disappointed that DOE has not proposed Energy Star criteria for all types of residential water heaters currently used by U.S. consumers. For all types of water heaters there are minimum efficiency models and more efficient models. For both the consumer's benefit and the nation's benefit, the Energy Star program should identify the better efficiency models of every type of water heater. In particular, consumers who use oil water heaters should be provided with similar information. Consumers that use the more efficient oil fired water heaters can typically save up to \$350 year in operating cost compared to less efficient models. We strongly request that the more efficient oil fired water heaters be included in the Energy Star program so that those consumers that use oil can participate in this very beneficial program.

Respectfully submitted,

Terry Mullen

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