

December 20, 2007

Mr. Richard Karney
Mr. Josh Butzbaugh
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Karney,

In general, I agree with SEIA's comments on solar hot water heaters, but I would like to offer two additional comments in my capacity as a citizen.

I agree with DOE and disagree with SEIA about the appropriateness of the term "energy saved" as a way to characterize solar thermal. The planet will see little difference if fossil fuel combustion is avoided through appliance efficiency or through solar contributions. "Energy saved" allows solar thermal to be compared, side-by-side, with the alternatives, none of which can deliver comparable savings, either in terms of dollars or in terms of embedded energy (with the possible exception of heat pump water heaters). Solar energy is not "generated" by the solar system, it is generated by the sun.

As to whether a 50%+ contribution is a reasonable requirement, the question is complex. What if a system provides 50%+ when it is installed and then use patterns change and it no longer provides 50%? Is there an implicit obligation to modify the system? At the same time, the soon-to-expire tax credit requires 50%, and there is something to be said for consistency in federal requirements. Let's hope that no one is so stupid that they will spend a lot of money on a solar system when the system cannot make a major contribution to their heating needs. My suggestion would be to simply require SRCC-rated systems and leave it at that.

Happy holidays,
Judy Kosovich