

July 12, 2007

ENERGY STAR Water Heater Post-Stakeholder Meeting Comments from Eemax Inc.

Eemax Inc. manufactures Electric Tankless Water Heaters in Oxford, Connecticut

1. Electric Tankless Water Heaters have the HIGHEST energy factor at 0.99+ of any water heater type that requires a fuel source input.
2. DOE reports have estimated 10-20% kWh savings for standby loss. Standby loss is not considered in the energy savings calculations, which is a large contributor of the total savings, and viable parameter.
3. Electric Tankless Water Heaters should not be held to the maximum 12kW to provide a 77° at 3.5-gpm requisite for whole-home use. This model is applicable to electric storage tank water heaters. One example where this standard has not been applied is the gas tankless water heater, which is granted a \$300.00 tax credit. (12kW maximum = 40,968 BTU/hr * most gas tankless water heater sold for the whole-home are 180,000 BTU/hr or greater) Electric Tankless Water Heaters can meet the required temperature rise when kW is increased. The 12 kW max could also be met if the flow rate of 3.5 gpm was lowered which would encourage water conservation with low volume shower heads and faucet flow restrictors.
4. Electric Tankless Water Heaters are virtually maintenance free as hard water does not contribute to scale build up (liming / calcification) Since there is no heat applied to the element when there is no demand for hot water the element will not scale. The heating element and internal body during periods of operation are cleaned by water movement through the water heater.

Electric Tankless Water Heaters are currently being successfully installed in large numbers to the residential whole-home market. Consumers are drawn to this product segment to take advantage of the documented dramatic energy savings, space savings and trouble free operation. Eemax strongly believes that consumers can benefit greatly from the ENERGY STAR program being applied to Electric Tankless Water Heaters. Eemax also looks forward to working with the Department of Energy to set up a well-crafted fact based guideline to the Electric Tankless Water Heater category.