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Mr. Richard Karney  
Energy Star Product Manager  
U.S. Department of Energy  
1000 Independence Avenue, SW  
Washington, D.C. 20585

Re: Draft Criteria for Energy Star Residential Water Heaters

Dear Mr. Karney,

Effikal has been helping water heater manufacturers increase the efficiency of their products for over 13 years. We support the DOE's efforts to promote energy conservation and the establishment of EnergyStar for residential water heaters. We have reviewed the comments submitted thus far regarding the draft criteria and attended the hearing held on June 5, 2007. We would like to submit the following comments for consideration:

- 1. EnergyStar for Residential Water Heaters.** We believe that an EnergyStar program for water heaters would have a positive impact. However, the water heater category as presented in the draft criteria is more complex than any other product category currently covered by EnergyStar and, I believe, is the reason for the great difference of opinion even within the same group of stakeholders. We agree with those who say that EnergyStar should only be granted to commercially proven products/technologies. This would also address the warranty issue as there would no longer be a need to persuade customers to buy an unproven product with a warranty from a company that may not be able to honor it in the worst of circumstances.
- 2. Energy Factor.** We believe that the initial Energy Factor for this program should deliver the maximum return for both the individual and the nation. We agree with those recommending EnergyStar for gas storage water heaters with a minimum EF of .62 along with similar incremental increases over the current minimums for oil and electric. This would save the most energy in the shortest time. The bar can always be raised to stay ahead of mandatory minimums as set by current and future DOE rulemakings.
- 3. Test Procedure.** We believe that any attempt to address shortcomings in the test procedure in this venue would derail the program. The current EF test procedure used to determine compliance with NAECA should be used to determine eligibility for EnergyStar. It may not be the perfect test procedure, but it is an understood baseline that can be used to compare what is currently in the field with what could replace it. If there is a general consensus that this is unfairly favoring tankless heaters, then use the higher minimums of 0.80 to 0.82 for gas tankless.

**4. Compliance.** We agree that any products granted EnergyStar must comply with current national product safety standards (i.e. Z21.10.1) including Flammable Vapor Ignition Resistance. We do not agree that they must also satisfy state requirements such as California's Rule 1121.

We appreciate this opportunity to participate and look forward to seeing the revised criteria.

Sincerely,

Cory Weiss  
VP, Engineering