

November 21, 2007

Richard Karney
Josh Butzbaugh
US Department of Energy
Energy Efficiency and Renewable Energy Division
1000 Independence Avenue SW
Washington, DC 20585

E-mail addresses: Richard Karney (Richard.karney@ee.doe.gov)
 Josh Butzbaugh (jbutzbaugh@drintl.com)

RE: ENERGY STAR Residential Water Heaters – Your Request for Comments

Dear Mr. Karney and Mr. Butzbaugh:

FPL is pleased to learn about the current DOE/EPA efforts to develop Energy Star criteria for residential water heaters. FPL wishes to offer the following comments regarding the promotion of the most efficient electric resistance storage water heaters. We do not agree that electric resistance storage water heaters should be excluded from the Energy Star designation, for the following reasons:

- Electric resistance storage water heaters have close to 50% of the US market share. Of this, the share of the high efficiency (0.95 EF) heaters is very low; in fact, the 0.95 EF water heaters are not readily available in several parts of the country including much of FPL territory. By designating such heaters as Energy Star, we believe consumer demand will accelerate the availability of such heaters in most areas of the country. Some national retailers will automatically stock appliances which are Energy Star certified.
- For a nominal additional equipment cost and no additional installation cost, a 0.95 EF electric resistance storage water heater would save 122 kWh per year compared to a new standard efficiency water heater in the average home in FPL's service area. Over time, that would add up to a substantial amount of energy savings to leave on the table without the consumer demand which would be generated by an Energy Star label.

On behalf of FPL, I urge you to consider the benefits of using the power of the Energy Star label to encourage the purchase of the most efficient products available when choosing a conventional electric water heater. Thank you for your consideration.

Sincerely,

Craig V. Muccio
Program Manager,
Conservation R&D Program
End Use Program Evaluation