



# GAMA-An Association of Appliance & Equipment Manufacturers

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## Product Divisions and Groups

Burner  
Controls  
Corrugated  
Stainless Steel  
Tubing Systems  
Direct-Fired  
Heater  
Direct Heating  
Fuel Cell  
Furnace  
Gas Appliance  
Connector  
Gas Detection  
& Analysis  
Gas Equipment  
& Services  
Venting Products  
Hydronics  
Institute  
Industrial Forced-  
Air Heating  
Infrared  
Motor & Blower  
Power  
Generation  
Vent-Free Gas  
Products  
Water Heater

October 30, 2007

Richard Karney,  
ENERGY STAR Product Manager  
U.S. Department of Energy  
1000 Independence Ave, SW  
Washington, DC

Dear Richard,

We support the establishment of Energy Star program for residential water heaters and recommend that the program address all residential water heaters in order to maximize the benefits of the program. GAMA intends to provide additional comments on the revised draft criteria released by the Department of Energy (DOE) on October 26, 2007.

Recognizing that the purpose of Energy Star is to help consumers identify the most efficient products available, we believe that an additional meeting with manufacturers and other industry leaders is necessary in order to adequately evaluate the comments and concerns that have been expressed for this program. Those concerns include: specific warranty criteria; the lack of a requirement for the water heater be listed as complying with the nationally recognized safety standard; and the exclusion of electric resistance storage, electric resistance tankless, and oil-fired storage water heaters from an ENERGY STAR program.

We request that DOE schedule an additional public workshop prior to the scheduled release of the final ENERGY STAR criteria for the residential water heater program.

Philip Gauthier  
Manager, Technical Services

