



GE Consumer & Industrial

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Richard Karney
Energy Star Program Manager
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Washington, DC 20585-0121

Re: Establishment of ENERGY STAR® Criteria for Water Heaters

Dear Mr. Karney,

GE is pleased to submit these 2nd round comments regarding the Department of Energy's ("DOE" or the "Department") draft criteria on creating Energy Star qualifications for domestic water heaters. GE supports the DOE and its effort to establish an Energy Star label on water heaters.

Whole Home Tankless Water Heaters

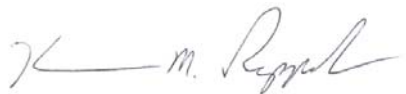
GE believes that the department's proposed criteria for Whole Home Tankless gas water heaters of 0.80 and 3.5 gpm at 77F rise is reasonable. However, GE will support lowering the gpm to make the qualification of 0.80 and 2.5 gpm at 77F rise.

GE consistently believes that Whole Home Tankless electric water heaters do not offer enough significance in energy efficiency compared to storage type water heaters. This lack of significance along with the extreme electrical installation requirements should eliminate this category from consideration as an Energy Star product.

Inclusion of Warranties as part of the Energy Star Criteria

GE consistently does not believe that Warranty requirements have any place in Energy Star criteria. It should be up to the individual company to establish the product warranty. Ultimately the market will sort out poor performance and poor service. Committed companies will stand behind their products to meet their consumer's needs. There is a major difference between the reliability risks of a compact florescent light bulb and a water-heating system. The barriers to sourcing, branding, distributing and selling a CFL—including poor performing one—are few. The same barriers—as relevant to high-efficiency water-heating systems are much more extensive. Only a large well-funded responsible corporation will be capable of bringing an ENERGY STAR-qualified water heater to market. We believe these corporations will stand behind their products in the marketplace making the requirement for warranties in any ENERGE STAR program unnecessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "K. M. Ruppelt". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Kevin Ruppelt

CC: Earl F. Jones