



August 28, 2007

Mr. Richard Karney
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

RE: Energy Star Residential Water Heaters

Dear Mr. Karney

On behalf of Rheem Water Heating we support the DOE's efforts to develop an Energy Star program for residential water heaters, where such a program will certainly help our country make better use of energy resources and serve to protect the environment through the use of energy efficient products. As a follow-up to the Stakeholder meeting of June 5, 2007 held in Washington DC, Rheem wishes to submit additional comments on the proposed draft criteria.

Gas Condensing Water Heaters and Advanced Non-Condensing Gas Storage

In development of draft criteria for gas condensing and advanced non-condensing water heaters, the technology was described as being "similar to conventional gas storage water heaters" while leveraging technologies (e.g. heat exchanger design, heat traps, etc...) to enhance overall efficiency. For both product categories, however, the DOE noted that the lack of availability for such product represents a "significant barrier" to inclusion in Energy Star.

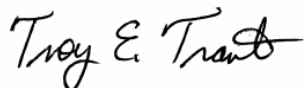
In this early stage of the Energy Star specification process for residential water heaters, however, it is clear that because of the alleged lack of availability of products efforts are being pursued to, in effect, amend the definition of a residential water heater (per Appendix E to Subpart B of 10 CFR Part 430) so as to relax the presently proposed Energy Star criteria. In particular, requests are being proposed to expand the Energy Star criteria to include small commercial condensing gas water heaters (i.e. input \leq 200,000 Btu/h, referred hereafter as "EPACT" covered products) that cannot be rated with an Energy Factor (EF) but which are sometimes used in residential applications.

As noted in our comments made before the Stakeholder meeting of June 5, inclusion of EPACT covered products will yield undesirable effects of promoting products subject to less stringent NOx emissions and safety standards as compared to current residential tank-type water heaters. The promotion of EPACT covered products in the Energy Star program, therefore, can be characterized as avoidance from standards (e.g. ANSI Z21.10.1 and 10ng/J NOx emissions). Rheem, however, finds no technical reasons prohibiting technology developed in the commercial sector from being transferred into the residential sector, while meeting standards directed to residential applications.

In closing, Rheem believes that manufacturers of tank-type water heaters that promote products for residential use should demonstrate compliance to the requirements directed to residential applications (e.g. ANSI Z21.10.1 and 10ng/J NOx emissions). It is important, we believe, to ensure that while promoting the worthy goal of energy efficiency that the Energy Star Program is not encouraging the installation of non-residential products that are not certified to the appropriate safety standards for the intended applications

Rheem remains eager to continue working with the Department in the development of an Energy Star program for residential water heaters and plans to participate as the process continues. We respectfully ask that the DOE consider the concerns outlined above.

Sincerely,

A handwritten signature in black ink that reads "Troy E. Trant". The signature is written in a cursive, slightly slanted style.

Troy E. Trant, P.E
Engineering Manager – Advanced Research