

May 25, 2007

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

Dear Richard:

Solene, LLC appreciates the efforts made by ENERGY STAR for considering solar water heating for inclusion in the residential water heater program. After further review we have some additional questions and comments regarding the draft proposal.

1. **FIFTEEN YEAR WARRANTY**- The draft proposal requires OG-300 certification via the SRCC for inclusion in the ENERGY STAR program. If the proposed fifteen year warranty applies to the complete OG-300 solar water heating system how would the warranty be realistically attainable? Most solar water heating systems consist of various components made by numerous manufacturers. How would it be possible to warranty the complete solar water heating system when most components consist of warranties significantly less than fifteen years? Secondly, would manufacturers or installation companies be responsible for the proposed fifteen year warranty? We also feel that solar water heating is being unfairly burdened by the proposed warranty period compared with the other technologies that are included in the draft proposal.
2. **DOE TESTING PROCEDURES**- We are in complete agreement with the statements that were issued by Danny Parker of the Florida Solar Energy Center regarding the DOE testing procedures.

Thank You,

Loren Zucconi
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