



GE APPLIANCES
a Haier company

John T. Schlafer
Senior Counsel

Appliance Park - AP2-225
Louisville, KY 40225

T: (502) 452-7603
F: (502) 452-0347
john.schlafer@geappliances.com

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Via E-mail (WaterHeaters@energystar.gov)

Ms. Abigail Daken
Manager, ENERGY STAR HVAC Program
ENERGY STAR Labeled Products
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: ENERGY STAR Program Requirements, Product Specification for Residential Water Heaters, Version 5.0, Draft 1

Dear Ms. Daken:

GE Appliances, a Haier company ("GEA"), respectfully submits the following comments to the Environmental Protection Agency ("EPA") in response to the EPA's Request for Information on ENERGY STAR Product Specifications for Residential Water Heaters, Version 5.0, Draft 1.

GEA is a leading, US manufacturer of home appliances and equipment. GEA offers a full suite of major appliances across seven brands, a full suite of space conditioning products to the residential and commercial market and has reentered the residential water heater market. GEA has been a participant in and contributor to the ENERGY STAR program since its founding almost 30 years ago. GEA devotes substantial resources to the development of new technologies to increase energy efficiency and engineering products to meet demanding ENERGY STAR specifications.

By excluding all gas storage water heaters available on the market and nearly all gas instantaneous water heaters on the market, ENERGY STAR's Specification 5.0 proposal threatens to make the ENERGY STAR mark irrelevant for gas water heaters. GEA urges ENERGY STAR, at a minimum, to consider the gas hot water heater market holistically and to maintain a larger range of UEF values for gas instantaneous hot water heaters such that the most expensive models of these highly efficient products are not the only ones that remain on the market. GEA, therefore, is aligned with AHRI in proposing a .93 UEF requirement for gas instantaneous hot water heaters. This

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would be a substantial increase from the current .87 requirement while maintaining a wider availability of Energy Star qualified gas water heaters.

GEA appreciates the opportunity to provide these comments. Please do not hesitate to contact me with any questions or concerns.

Very truly yours,



John T. Schlafer