From: "Harvey Sachs" <hsachs@aceee.org>
To: "Jacob Talbot" <jtalbot@aceee.org>, Abigail Daken/DC/USEPA/US@EPA
Date: 09/09/2011 05:16 PM
Subject: Loophole: was ACEEE Comments on ENERGY STAR Product Specification for Residential Water Heaters Version 2.0: Draft 1

Abigail -
We're really concerned about the POU definition that would consider 40 gallon "TableTop" electric resistance water heaters as eligible for EnergyStar. This is not what we envisioned when agreeing that POU could include very small tank units, and we believe it would completely loophole and subvert the intent of rejecting tank resistance water heaters from the program, from the beginning.

AS DOE moves to looking at full fuel cycles, and EPA continues its focus

on pollution prevention, including greenhouse gases, this does not seem to be the time to bring smaller whole-house tank units into the program.

Thanks so much for the opportunities to be involved.

harvey

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>>> Jacob Talbot 9/9/2011 5:03 PM >>>
Dear Abigail,

Please find attached the comments from ACEEE on the ENERGY STAR Product Specification for Residential Water Heaters Version 2.0: Draft 1. Please contact me if you have any questions or concerns, and thanks for the opportunity to comment.

Best,
Jacob

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