

February 5, 2012

Ms. Abigail Daken
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
6202J
Washington, DC 20460

Dear Ms. Daken:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to *ENERGY STAR Product Specification for Commercial Water Heaters Version 1.0 Final Draft*, released by the Environmental Protection Agency (EPA) on December 6, 2012.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and seven Canadian provinces. In 2011, CEE members directed \$7.8 billion of energy efficiency program budgets in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as our national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

CEE supports the introduction of commercial water heaters into the ENERGY STAR program

CEE agrees that the ENERGY STAR label can help commercial customers identify high efficiency gas storage and tankless water heaters and fully supports the current proposal. CEE agrees with EPA's decision to defer discussion of appropriate performance levels for electric heat pump water heaters until a test method is available. CEE recommends that EPA only proceed when an industry accepted test method is available and sufficient data is available to analyze and then determine an appropriate performance level. Finally, CEE concurs with the decision to address product performance rather than the component parts of a system. As a binary labeling tool for

contained products, the application of the ENERGY STAR label on a component part of a system may have detrimental implications to the Brand promise.

CEE would once again like to thank the EPA for the opportunity to comment on *ENERGY STAR Product Specification for Commercial Water Heaters Version 1.0 Final Draft*. Please contact CEE Senior Program Manager Kara Rodgers at 617-337-9262 or krodgers@cee1.org with any questions about these comments.

Sincerely,



Ed Wisniewski
Executive Director