



GE Appliances & Lighting

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Abigail Daken
ENERGY STAR Water Heater Program Manager
U.S. Environmental Protection Agency
Waterheaters@energystar.gov

Re: ENERGY STAR Version 2.0, Draft 3 Residential Water Heaters Product Specification

Dear Ms. Daken,

GE is pleased to submit these comments regarding Version 2.0, Draft 3 of the Environmental Protection Agency's ("EPA" or the "Agency") ENERGY STAR Program specification for residential water heaters. Energy-efficient water heaters deliver substantial energy and cost savings to American consumers. Accordingly, GE, which manufactured the first ENERGY STAR-qualified heat pump water heater, supports EPA's efforts to further develop the product category.

GE is a member of the Air-conditioning, Heating and Refrigeration Institute (AHRI) and supports and incorporates herein the comments filed by AHRI in this matter and adds these additional comments.

I. Scope

GE supports the exclusion of add-on heat pumps and point-of-use (POU) water heaters. Installing add-on devices to conventional water heaters reduces the reliability of the host water heater. And, as EPA recognized, will void the host water heater's warranty as usually happens when the original warranted product is altered.

As for POU units, EPA acknowledged that the benefits of these units is unproven and that they "may or may not be as energy-saving" as other technologies. GE's analysis supports this conclusion.

II. Qualification Criteria

As noted in AHRI's comments, the compressor shut-off-alert requirement should be clarified and narrowed. The alert should be limited to energy-related occurrences. Thus, unless a system failure or other unplanned event causes the compressor to shut off, no

alert should be required. The comment in the Note that "it is not unusual for units to be installed in areas with insufficient floor drainage," is doubtless true, but, if the unit's energy performance is not affected as a result, is not relevant in establishing the criteria for this product category. For this reason, the first sentence in 3) A.1. should be modified to read:

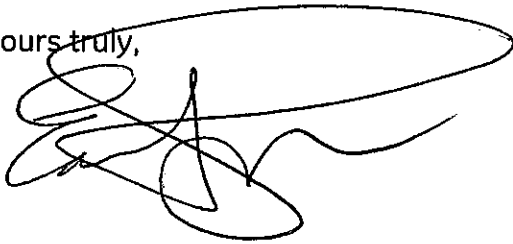
The unit shall include a visible or audible alert to notify if the compressor shuts off due to a blockage in condensate drain or any other system failure.

III. Conclusion

GE supports the exclusion of add-on heat pumps and POU units from the ENERGY STAR residential water heater program. And, for reasons stated in II., above, urges EPA to revise the compressor shut-off-alert requirement to apply only in the event of a system anomaly.

Please let me know if you have any questions or want additional information.

Yours truly,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned below the text "Yours truly,".