

April 16, 2012

Ms. Abigail Daken
ENERGY STAR Water Heater Program Manager
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Comments on Energy Star Water Heaters Version 2.0 Draft 3

Dear Abigail:

The International Association of Plumbing & Mechanical Officials is pleased to provide comments on the Draft 3 Version 2.0 Product Specification Eligibility Criteria for Energy Star qualified water heaters. IAPMO is pleased that EPA has determined to continue the labeling of solar water heaters in the Energy Star Program. At this time, our comments pertain only to Section 1. (A) (d) of the Eligibility Criteria. IAPMO recommends that this Section be changed to read:

- d) Solar water heaters must include a collector and storage tank, and must use the sun's thermal energy to heat water. Solar water heaters eligible for the ENERGY STAR Water Heaters Program must be certified in accordance with the applicable American National Standard for solar water heaters, or in accordance with SRCC OG-300.

This change would ensure that solar water heaters certified in accordance with American National Standards would be eligible for inclusion in the Energy Star Program. In addition, by removing the informational language pertaining to system types, the requirements will allow for inclusion in the Program of innovative products which may not fall into pre-defined categories, but are nevertheless able to demonstrate compliance with certification criteria.

We appreciate the opportunity to comment on this draft document. If you have any questions, please do not hesitate to contact me.

Respectfully Submitted,



Les Nelson
Director of Solar Heating & Cooling Programs

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