From: David E. Seitz [mailto:david@deseitz.com]
Sent: Friday, September 09, 2011 12:24 PM
To: Waterheaters@energystar.gov; daken.abigail@epa.gov
Cc: Craig Haglund; 'Regina Hunt'; 'William F Hines'; Harvey Sachs; 'Kevin Ruppelt'; 'Gary Klein'; 'Carl Hiller'; 'William Hoover'
Subject: RE: EPA: Energy Star Draft 1 Waer heaters Spoecification Version 2.0, Eligibility Criteria e-mail, and notice for webinar for Aug 23

Abigail and Chad,

I wanted once more to make a few final comments on this the last day.

Again, we at SEISCO truly appreciate your efforts and support them. As to the issue of inclusion of the ETWH having a power rating above 12kW up to 25 kW, an additional delay of 5 or more years
is not in the interest of the Energy needs of the Country, the American family particularly those 40%+ that have not had a reasonable choice for advanced electric technologies, ETWH manufacturers to
whom we must look to for the future advanced electric technology, nor for the EPA whose fine efforts demonstrate it does not intend to make the mistakes of the part by picking winners and losers.

I know that you have the proper support for these products and am requesting that the EPA "**approve the ETWH above 12kW up to the 25kW *conditioned* upon the NAECA inclusion of these products through**
legislative action". Certainly the process to get this legislative approval has long been underway and hopefully will come to fruition very soon. Therefore if the products are approved now, subject to this
action, it would avoid the long delay for the next cycle, allow the EPA to simply send out a memorandum of compliance when the products are included under NAECA.

As to the smaller storage tank heaters inclusion, We all support their inclusion in Energy Star, as you know, and I believe they should be "exempt" from the requirement for EF testing. The products should have a minimum
envelope of insulation and that should be more than sufficient to satisfy everyone. Trying to develop a test protocol for these products in impractical and, since they are recognized to be very efficient,
in my opinion unproductive. Furthermore this approval by EPA would be strongly supported and put to rest the concern of many, that the argument to delay electric tankless until there is

the inclusion of this small
storage tank product may well be just another ploy by some manufacturers who have conflicting interests.

In closing I want to again remind you of the strong benefits of these ETWH products in applications not only for both for energy and water savings but also strong job creation potential since **unlike other**
Tankless these products are overwhelmingly U.S. products, manufactured in this country.

Applications include:

1. Point of use for clusters of hot water fixtures eliminating long hot water runs.

2. Point of use, even in retrofit in bathroom, where the ETWH can easily heat the water in the hot water supply, previously heated preventing a huge water and energy loss.

3. Back up for Solar thermal systems. Many organizations , PATH, HUD, NAHBRC,, in a great many applications including "Zero Energy Homes" demonstrated that when the solar panel provided 100% of its solar heating component to a storage tank whose heating source was disabled to avoid overriding the solar, and a ETWH was installed at the outlet of this tank heating only the actual water used, and only when additional heat was needed is one of if not the most energy efficient design for solar thermal.

4. Off Peak Space heating when combined with hybrid dual fuel source allowing space heating energy requirements to be split between solar, or fossil fuel during the day, and the electric tankless
rated and listed for space heating to provide an extremely valuable "Off Peak" application

5. Same as in 3-4 above as ideal for heat recovery i.e. desuper-heater, heat pump and geo thermal designs.

6. ELECTRICITY IS THE ONLY ENERGY THAT CAN AND WILL BE GENERATED SOLELY BY RENEWABLE AND SUSTAINABLE SOURCES.

We really can't wait and continue to disincentive the development of such an important element and significant contribution to any Energy Program.

Thank you for your consideration and effort,

Sincerely,
SEISCO INTERNATIONAL LIMITED
David E. Seitz, Pres/CEO

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