

Abigail Daken
Environmental Protection Agency
1200 Pennsylvania Ave.
NW Washington, DC 20460

Dear Ms. Daken,

On behalf of Intellihot Green Technologies Inc.(Intellihot), I would like to express our appreciation for the opportunity to comment on the ENERGY STAR specification for Commercial Water Heaters, Draft 1 Version 1.0

Intellihot is the first Condensing Tankless Gas Water Heaters designed and built in the USA (Galesburg, Illinois). With special focus on commercial applications, we are committed providing systemic energy savings to the consumers while lowering the impact on the environment. Please find our comments below regarding Line 102, 103of the specification.

- a. It is our experience that commercial applications have varied operational cycles, both within the application and amongst various commercial applications.
- b. Due to this very nature, we feel thermal efficiency and stand by losses by itself does not adequately represent the benefits a consumer (or the environment) can realize from a particular model.
- c. We suggest including a quantitative measure where in the water heater is able to self-adapt itself to the operational cycles in that particular application/installation, to then generate the maximum possible savings, while simultaneously minimizing the impact to the environment. Such a quantitative measure should be then used in addition to Thermal efficiency and Stand By losses to truly represent the available choices to the consumer.

Intellihot thanks you for this opportunity comment on the ENERGY STAR specification for Commercial Water Heaters, Draft 1 Version 1.0

Regards

Sivaprasad Akasam
Vice President - Engineering
Intellihot Green Technologies Inc