

March 18, 2010

Honorable Cathy Zoi
Assistant Secretary for Energy Efficiency and Renewable Energy
U.S. Department of Energy
1000 Independence Ave, SW
Washington, DC 20585-0121

Re: Water heater energy conservation standards docket: EERE-2006-BT-STD-0129 and RIN 1904-AA90

Dear Assistant Secretary Zoi:

We are writing about the above-referenced rulemaking as water heating represents the third largest energy use in the home, and therefore, consumers stand to benefit greatly from more stringent efficiency standards for residential water heaters.

We applaud the Department of Energy for its initial proposal to increase efficiency standards. But we urge you to take the additional step of strengthening the requirements for the largest water heaters. Stronger standards for the biggest units would both boost economic benefits for consumers and reduce global warming emissions by more than 40% compared to the proposed rule. Just as importantly, DOE would help spur the use of advanced technologies – condensing gas and heat pump water heaters – to become mainstream products and speeding the transition to next-generation water heaters.

By strengthening the standard, which becomes effective five years after the rule is published, for the larger volume storage, the following additional savings could be achieved over 30 years:

- 1.1 quads of energy or enough to power over 5 million typical U.S. homes for a year;
- \$6.4 billion dollars in net savings to consumers and businesses; and
- 63 million metric tons of CO₂, an amount equivalent to the annual emissions of 25 coal-fired power plants.

In adopting Trial Standard Level (TSL) 5 level as opposed to what has been proposed, the median payback period would increase slightly from 2.7 to 3.0 years for gas and from 5.8 to 5.9 years for electric. However, we feel that these are reasonable payback periods and that consumers will benefit in the long run from the reduced operating costs. The life cycle savings increase in both instances as well from \$68 to \$78 for gas; \$39 to \$96 for electric.

We appreciate your consideration of our comments and urge DOE to adopt stronger standards for the larger volume water heaters. Capturing these significant savings will further benefit consumers and help our environment.

Sincerely,

Mel Hall-Crawford
Energy Projects Director
Consumer Federation of America

Phyllis Rowe
President Emeritus
Arizona Consumers Council

Diane Brown
Executive Director
Arizona Public Interest Research Group

Linda Sherry
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Bill Newton
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President
Massachusetts Consumers Council

Jack Cooper
Executive Director
Massachusetts Union of Public
Housing Tenants

Charles Harak
National Consumer Law Center on behalf
of its Low Income Clients

Beverly Isbell Brown
Oregon Consumer League

Randall Chapman
Executive Director
Texas Legal Services Center

Irene Leech
Executive Director
Virginia Citizens Consumer Council

cc: Dr. Henry Kelly, Principal Deputy Assistant Secretary, EERE
Dr. Kathleen Hogan, Deputy Assistant Secretary for Energy Efficiency
Ronald J. Risser, Program Manager, Office Of Building Technologies
Brenda Edwards, Building Technologies Program
DOE Docket: EERE-2006-BT-STD-0129 and RIN 1904-AA90