



# GE Appliances & Lighting

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<b>10-BSTD-01</b>	
<b>DATE</b>	<u>OCT 31 2011</u>
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October 31, 2011

Via email: [docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Docket No. 10-BSTD-01, October 13 and 14, 2011 Workshop - 2013 Building Energy Efficiency Standards: PROPOSED REVISIONS TO WATER HEATER REQUIREMENTS IN CEC TITLE 24 STANDARDS

Dear CEC.

GE is pleased to submit these comments regarding the California Energy Commission (“CEC” or the “Agency”) Proposed changes to the CEC Title 24 Standards for Water Heater Requirements.

GE supports the efforts of the CEC in promoting energy –efficient water heaters in requirements for building requirements for new constructions, but believes these requirements should be based on a technology neutral basis.

Specifically, in your document for” proposed” modifications to the CEC Title 24 Standards, Subchapter 8, entitled “150.1\_Res\_General\_Performance\_and\_Prescriptive.pdf”, it is stated in section 8.D. that

For systems serving individual dwelling units, electric-resistance water heating may be installed as the main water heating source only if natural gas is unavailable and only if the water heater is located within the building envelope and a minimum of 50 percent of the annual energy for water heating is provided by a passive or active solar water-heating system.

GE believes that product installation requirements aimed at promoting energy conservation should be technology neutral, i.e., once the objective has been determined—in this instance the requirement that for electric-resistance units 50% of water heating energy must come from a renewable source—other technologies that solar must be allowed. For example, an electric heat pump water heater can provide efficiency gains comparable to or better than a solar water heater. Based on U.S. Department of Energy (DOE) test procedures and national energy information electric heat pump water heaters can achieve the 50% GOAL. In fact, based on DOE test procedures the GE GeoSprings water heater is, on average, 62% more efficient than a conventional electric resistance water heater,

makit it a much more energy and cost effective approach for the consumer to meet the same ultimate goal of the CEC proposal.

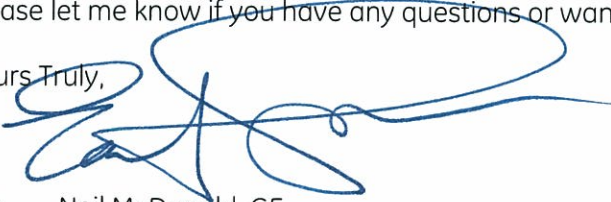
Likewise, requiring only natural gas fuel source installations on future construction, is unnecessary when high efficiency electric water heating technology is available. GE would propose the alternate wording of section 8.D. as:

For systems serving individual dwelling units, electric-resistance water heating may be installed as the main water heating source ~~only if product has an Energy Factor rating of 2.0 or greater and if natural gas is unavailable and only if the water heater~~ is located within the building envelope ~~and a minimum of 50 percent of the annual energy for water heating is provided by a passive or active solar water heating system.~~

Again, GE appreciates your consideration in adopting these changes and looks forward in your response.

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

Yours Truly,

A handwritten signature in blue ink, appearing to be "Neil McDonald", written over a large, light blue circular scribble.

CC: Neil McDonald, GE  
Frank Stanonik, AHRI