



COALITION FOR ENERGY EFFICIENT ELECTRIC TANKLESS WATER HEATERS

October 31, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-BSTD-01
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET

10-BSTD-01

DATE OCT 31 2011

RECD. OCT 31 2011

RE: Docket number 10-BSTD-01 and indicate "October 13 and 14, 2011 Workshop - 2013 Building Energy Efficiency Standards"

I am writing on behalf of the Coalition for Energy Efficient Electric Tankless Water Heaters to urge you to include Electric Tankless Water Heaters ("ETWHs") as a qualifying energy savings measure in the new California Building Energy Efficiency Standards.

With the ability to operate at the point-of-use at approximately 99% efficiency, ETWHs are the most energy efficient and water efficient water heater in the marketplace. ETWHs also serve a vital function by providing water heaters using renewable energy with a highly efficient and reliable backup system.

Below are comments I propose we add regarding 150.1 (c)(8)(C) & 150.1 (c)(8)(D):

It is recommended electric tankless water heaters be an efficient alternative to the above sections as a "point of use" solutions for the following reasons:

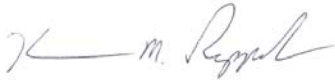
- Locating an electric tankless heater at the point of use saves both water and energy.
 - Water is saved because the hot water heat at the use point and thus arrives earlier (less waiting). This is critical in California which is water constrained.
 - Energy is saved because it heats water at approx. 99% efficiency – gas is typically much less efficient
 - Energy is also saved by not heating the water which went down the drain unused
- The above savings have been defined by ACEEE (Emerging Water Heater Technologies and Practices for Energy Efficiency for 2011 <http://aceee.org/press/2011/10/efficient->

[water-heating-technologies](#)), Coalition for Energy Efficient Electric Tankless Water Heating Study, NAHB study, and work completed recently for the EPA.

- No additional floor space to build which requires heating and cooling is necessary as they hang on the wall.
- Less landfill implications due to their size
- When using electricity to heat water this allows CA to utilize their renewable energy sources and efforts to increase this percent – gas is not renewable.
- Utilizing Solar is quite expensive and often does not have a practical payback period.
- Electric tankless can also be an excellent back-up for a solar system

We thank you for your continued consideration of these important issues. If you have any questions about ETWH technology, please contact my office.

Sincerely,



Kevin M. Ruppelt

Chairman
Coalition for Energy Efficient Tankless Water Heaters

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