

**From:** Adams, Charlie  
**Sent:** Friday, May 06, 2011 03:38 PM  
**To:** Adams, Charlie  
**Cc:** Dana, Paul; Parker, Mike; Porter, Jerry; Schulz, Matt; Schuh, Darrell; Roy Smith; Ted Poulin; Berning, Dave; Dan Snyder  
**Subject:** Comments on ENERGY STAR verification testing program

Hi, Ashley.

A.O. Smith has the following comments in regard to DOE's ENERGY STAR® verification test program:

- DOE and EPA appear to be working to pool the units tested under each program so that there is no double testing of units, and that all units tested count towards the total required for test during the specified period. This is great, and we appreciate their efforts.
- In the selection for testing, we agree that new technologies and units that are above the Energy Star level of performance are of interest, but the majority of testing should be done on the units with the highest level sales, since these are the units that will have the greatest total impact on energy consumption.
- In regard to section 5.1, Basic Model Identification, we urge DOE to ensure that the definition of basic models used by DOE match the definition of basic models for a given manufacturer, as determined by that manufacturer, and reported to DOE in that manufacturer's certification filings (regardless of whether that manufacturer reports through a CB, or directly).

Thank you for the opportunity to comment, and feel free to contact me if you have additional questions.

Regards,

**Charlie Adams**

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