

---

**From:** Larry Hunter  
**Sent:** Thursday, October 28, 2010 8:30 AM  
**To:** SmartGridPolicy  
**Subject:** FW: Smart Grid RFI: Addressing Policy and Logistical Challenges

---

To Whom It May Concern:

Providing comment on: Consumer facing programs such as feedback, demand response, energy efficiency, and automation strategies.

Over the last several decades, great strides have been made in the effort to transport power from producer to consumer in the most efficient manner possible.

At the consumer level virtually every appliance (washer, dryer, HVAC, water heater) used in the home as well as automobiles receive some sort of energy/efficiency rating associated with an agency of the U.S. Federal Government (DOE, Energy Star, EIA, EERE).

Addressing the Energy Efficiency component of Smart Grid technology should be a priority for the long term viability of the program. If the methodology for testing the individual end use appliance is in question, how can the efficiency of the grid be properly measured. The American Clean Energy and Security Act of 2009 (HR2454) included a proposal to evaluate appliances on a "total fuel cycle" basis taking into consideration line losses in producing and transporting the type of energy used by the consumer.

According to the American Council for an Energy Efficient Economy (ACEEE), evaluating appliances on a total fuel basis has a dramatic affect on "true efficiency".

As an example, an electric water heater may have an energy factor (EF) of 95% but when line losses are taken into consideration, the true efficiency is 29%.

Section 145 paragraphs 1 - 6 addresses the "Energy Efficient And Smart Appliance Rebate Program" which in summary provides potential rebates to consumers (FY 2010 through 2015) for the installation of Energy Star rated appliances and/or appliances with Smart Grid capabilities. Basing a national Smart Grid system and/or the distribution of Rebates based solely on the rated efficiency of the appliance with no regard for how the energy to operate that appliance is delivered should be cause for concern.

Respectfully Submitted,

*Larry Hunter, RCGC, CGP*  
*Registered Commercial Gas Consultant*  
*Certified Green Professional*  
*NAHB Green Verifier*  
*(O)850-436-5050*  
*(fax)850-474-5331*  
Energy Services of Pensacola  
1625 Atwood Drive  
Pensacola, Florida 32514