



January 21, 2009

Ms. Katherine Muncaster  
Senior Policy Analyst,  
Energy Efficiency Branch  
Ministry of Energy, Mines and Petroleum Resources  
1810 Blanshard St. 4<sup>th</sup> Floor  
Victoria, British Columbia  
L5N 6J7

RE: Proposed Energy Efficiency Requirements for Residential Water Heaters

Dear Ms. Muncaster

We received a copy of Mr. Ralph Suppa's January 13, 2009 letter to you providing the Canadian Institute of Plumbing & Heating's (CIPH) updated proposal for energy efficiency regulations for residential water heaters. We support this proposal and recommend that it be adopted as the Phase 1 minimum efficiency requirements for residential gas and electric water heaters in British Columbia.

Also, since it appears that the Province is still considering an alternative proposal to specify a minimum thickness of insulation, we want to reaffirm our previous comment that the proposed regulation for electric water heaters should not be design prescriptive nor promote one connection configuration over the other. As we had noted, the process has started to consider revisions to the efficiency test procedure for residential water heaters. We request that you allow that process to work and recognize that a revised test method appropriate for all types of electric residential water heaters is needed to develop an effective Phase 2 regulation for electric storage water heaters.

Sincerely

A handwritten signature in black ink, enclosed in a rectangular box. The signature reads "Frank A. Stanonik" in a cursive script.

Frank A. Stanonik  
Chief Technical Advisor