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From: Rodolphe POIROUX [rodolphe.poiroux@edf.fr]
Sent: jeudi 2 septembre 2010 2:03
To: KOLB Stephan (ENER)
Cc: Christian-B NICOLAS; Bruno ZIEGLER
Subject: labelling and Ecoconception project for water heaters - EDF comments

Dear Stephan,

Please find the Electricité de France comments about your labelling and Ecoconception project for water heaters, as expected for the 3th of september:

ESWH are a crucial point for the electrical energy suppliers as this technology highly contributes to improve the energy efficiency of the electricity production with consequences to the CO2 emission of the electrical energy and attractive cost for the consumers. On the time being this possibility of energy storage is the only one that is cost effective for suppliers and customers. The other solutions of energy storage are either fully exploited (hydraulic pumping in reservoir), either not available at large scale (inertia wheels, chemical storage).
Proposals from EdF are presented with respect of the objectives of the Commission to ensure a better efficiency of the technical solutions proposed to consumers for the domestic hot water production.

As presented in the project the energy results are linked to a methodology which needs clarification about

- accuracy and reproducibility of the methodology itself
- consistency between experimental uncertainty of the methodology proposed (and related calculation process)
- the levels of energy efficiency proposed for classification.

The identification of the distribution losses, energy recovery factor and determination of the smart control test procedure need to be clarified.

As written it is still doubtful that ESWH will be a remaining solution offered to customers after 2015.

So a first point there is a need to proceed to a final evaluation of the products once the methodology has been finalised in order to get a consensus about the position of the products with the proposed classification.

Comments and proposals are based on this themes with the different options preferred and ordered as follows:

- offer a specific label depending on the main energy (electricity, fossil fuels, renewable energies) in order to adapt the requirements to the potential of efficiency for any technical solutions
- reduce the minimum values required for the classification of 1 to 2% to take in account the uncertainty due to measurements and reproducibility of the test methodology proposed
- propose customised requirements for the different energies (Class E for electricity solutions, Class D for fossil fuels and class C for renewable energies)

Sincerley yours

Rodolphe POIROUX
EDF Direction du Marketing Stratégique
Adjoint au Directeur
20, Place de la Défense
92050 PARIS LA DEFENSE CEDEX
Office: 33 (1) 56 65 05 29
Cell: 33 (6) 14 67 53 03

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