



MEMORANDUM

From: Nathaniel Kogler

To: United State Department of Energy, expartecommunications@hq.doe.gov

Re: Ex Parte Meeting with DOE staff with respect to EERE-2014-BT-TP-0008-0016

Date: July 25, 2016

This memo memorializes the meeting that occurred with Bradley Corporation representatives and the Department of Energy (DOE) on July 18, 2016. The following is a summary of the topics discussed at the meeting:

1. The comments submitted by Bradley Corporation on July 8, 2016 in the above-referenced docket, the types of products sold by Bradley's subsidiary Keltech Incorporated, and the typical applications and uses of such products;
2. Discussion of electric flow activated instantaneous water heaters that contain under 10 gallons of water, especially those intended for safety or specialty applications, the lack of clarity as to how and why they might be captured by the proposed rules, the unintended and cost-prohibitive consequences of such an impact, and the potential for test procedures that would be specific to such products;
3. Potential for creation of an alternative efficiency determination method (AEDM) for electric flow activated instantaneous water heaters that contain under 10 gallons of water; and
4. The definition in the proposed regulations for electric flow activated instantaneous water heaters, particularly as it should or should not apply to products that contain under 10 gallons of water such as those of Keltech.

The meeting was held at DOE's offices, and the attendees were:

Ashley Armstrong (DOE)

John Cymbalsky (DOE)

Johanna Jochum (Attorney, DOE)

Nathaniel Kogler (Director of Product Management, Bradley Corporation)

Nicholas Siler (Director of Engineering, Bradley Corporation)

Thomas McCann Mullooly (Attorney at Foley & Lardner LLP on behalf of Bradley Corporation)