



Ottawa, Canada
K1A 0E4

Review of Proposed Clarification to the ENERGY STAR® Specification For Bottled Water Coolers

Natural Resources Canada (NRCan) administers and promotes the ENERGY STAR mark in Canada. NRCan has reviewed the proposed specification clarifications for bottled water coolers and offers the following comments.

Item 1

NRCan is aware of products defined as water coolers that have refrigeration compartments. We would like to know if these have been considered when the ENERGY STAR levels were defined. We would also like to know if Table 1 takes into account the energy consumed by the refrigerated compartment.

Item 2

We were unable to find any details regarding the development of the current ratings and levels on the ENERGY STAR web site. A sample of test results (of energy consumption) for a variety of types of water coolers with and without refrigerated compartments may help us understand, quantify and qualify the criteria levels selected. We would ask for a draft of such results to help us better understand how challenging the criteria actually is, and how it applies to a cross section of products available to consumers.

Item 3

Section 1 - Definitions:

A. Bottled Water Coolers

NRCan suggests that a clause identifying that the product consumes energy. This may be redundant, seeing as the next section (section 2 Qualifying products) outlining 'qualifying products' specific the three types A,B,C, may make this clear, but it may be beneficial to add such a clause to ensure that non-energy using water dispensers do not apply for ENERGY STAR.

Item 4

According to the definitions, a Type A cooler can dispense 'cold and room temperature' water, while a Type C unit may also dispense 'cold and room temperature water'. This could lead to some confusion and the differences between the two types should be further explained.



And finally, we feel very strongly about the following point:

Item 5

Section - 3 Energy Efficiency Specifications

NRCAN believes that there are more efficient ways of boiling water and that a Tier 2 ENERGY STAR criteria which would eliminate Type B units be considered. The use of Type A or C units in conjunction with a kettle or similar water heating source is far more efficient than the use of a bottled water cooler.

If you have any questions about our comments, please do not hesitate to contact me.

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