

Summary of Comments Received from Stakeholders on the Version 1.1 ENERGY STAR® Specification for Water Coolers and EPA Responses

Introduction

EPA sincerely appreciates stakeholders who took the time to review the current Version 1.1 ENERGY STAR specification for Water Coolers and provide thoughts on how the document should be modified. Some stakeholders did not want their comments to be posted publicly to the ENERGY STAR Web site, so EPA has summarized all feedback received below and explained the rationale for any changes that appear in the Draft 1 Version 1.2 specification (“Draft 1”).

Feedback on ENERGY STAR Energy Efficiency Levels

Stakeholder comment: We support the proposed expansion to bottle-less water coolers such as Point of Use (POU).

EPA response: EPA, based in part on several requests from ENERGY STAR partners, has broadened the definition of a water cooler in Draft 1 to permit the qualification of POU and bottle-less coolers. POU and other bottle-less coolers may qualify starting January 22, 2010.

Stakeholder comment: “Bottle-less water coolers” need clear definition as they can include a wide range of products (POU Conversion Systems, under-sink pressure type units, variety of wall and floor-standing fountain-style units, etc). It is recommended that EPA strive for consistency with UL and IEC.

EPA response: The definition of a “Water Cooler” in Section 1.A. of Draft 1 requires that models must be “freestanding.” This definition intends to prevent under-sink and building-integrated units from qualifying. EPA will revisit the question of appropriate definitions for this product category in 2010 during the next specification revision.

Stakeholder comment: “On demand” products and features should be treated as a separate category under ENERGY STAR to avoid under-reporting of energy use. Similarly, EPA should carefully consider methods of fairly comparing “on demand” heating and/or cooling with products that maintain hot and cold tank temperature continuously.

EPA response: EPA will address this issue in the 2010 specification revision. Draft 1 does not change the energy efficiency criteria from the current Version 1.1 specification, which were set based on products that maintain hot and cold water continuously.

Stakeholder comment: Current standby energy limits are acceptable.

EPA response: EPA agrees with stakeholder comment for this specification revision. Standby energy limits will be reviewed starting in the summer of 2010.

Stakeholder comment: If criteria are made more stringent, EPA should consider differences in volumetric size, hot and/or cold capacity, and features such as refrigerated compartments.

EPA response: EPA will address this issue in the 2010 specification revision. In the interim, EPA intends to collect information concerning these possible factors and others to develop a robust data set for analysis.

Stakeholder question: Is EPA's intention to create different levels based on multiple performance outputs of different products?

EPA response: EPA has retained the Version 1.1 standby limits in Draft 1. Standby limits will be reevaluated with a larger specification revision effort expected to begin in the summer of 2010.

Stakeholder comment: Use of a timer could threaten test procedure consistency. The California Energy Commission and proposed federal legislation do not permit use of a timer.

EPA response: Timers and other energy-saving features may allow for additional energy savings over current models available on the market. In Draft 1, EPA explicitly allows units with these features to qualify for ENERGY STAR. During the 2010 revision process, EPA will evaluate whether models with these features should be included in the same category as models that supply hot and cold water continuously, and address the test procedure as needed. As ENERGY STAR energy-efficiency criteria will need to go beyond any federal requirements, EPA does not want to create disincentives for the development and application of timers and other energy-saving approaches. EPA believes that disallowing the use of timers during the test procedure would also provide an inaccurate representation of the energy savings potential of a model employing a timer. Under the final Version 1.2 specification, EPA will ask manufacturers to specify whether the model employs a timer or other energy-saving feature (e.g., room occupancy sensor) when seeking ENERGY STAR qualification for a model.

Feedback on ENERGY STAR Test Procedure

Stakeholder comment: We support EPA's proposal to require that products are tested as shipped.

EPA response: Draft 1 clarifies that POU and bottle-less devices must be tested as shipped. Partners that learn that any previously-tested and qualified bottled water coolers were NOT tested as shipped should contact EPA immediately to discuss plans for retesting and re-qualification.

Stakeholder comment: We recommend changing bottle sizes in the definition of a Bottled Water Cooler to include a range of 3 – 5 gallons.

EPA response: EPA has removed the bottle size requirement in Draft 1 since bottle-less devices can also qualify.

Stakeholder comment: We recommend adding Celsius conversions to the sections on Ambient Temperature and Dispensed Water Temperature and metric conversions for measurements.

EPA response: EPA agrees and has added Celsius and metric conversions throughout Draft 1.

Stakeholder comment: Add a new condition: “Measurement of Dispensed Water Temperatures: Dispose of the initial 100ml dispensed water, dispense 200 +/-5mL water using a 250 +/- scaled measuring container. Measure the water temperature in the container immediately after stopping the water flow.”

EPA response: EPA intends to address this suggestion during the 2010 specification process.

Stakeholder comment: We recommend changing the section on Airflow to remove prohibition of artificial airflow increase and instead reference the following: “Airflow around the unit must be no greater than 0.25 m/sec [imperial unit here].”

EPA response: EPA intends to address this suggestion during the 2010 specification process.

Stakeholder comment: Add a statement to require that the Wattmeter used to measure the power consumption should have a minimum resolution of 0.1 Watt and an accuracy of +/-2%.

EPA response: EPA has discussed this recommendation with the stakeholder and has added a requirement of 1 Watt minimum resolution and a precision of +/-2%.