



NYSERDA

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NYSERDA Comments on ENERGY STAR Draft 1 Version 3.0 Product Specification for Room Air Cleaners Eligibility Criteria

Dear Steve Leybourn,

The following comments are submitted on behalf of the New York State Energy Research and Development Authority (NYSERDA). NYSERDA is a public benefit corporation and offers information and analysis, innovative programs, technical expertise, and support to help New Yorkers increase energy efficiency, save money, use renewable energy, and reduce reliance on fossil fuels. NYSERDA’s mission is to advance clean energy innovation and investments to combat climate change, improving the health, resiliency, and prosperity of New Yorkers and delivering benefits equitably to all. NYSERDA works to help implement New York State's nation-leading climate agenda, which is the most aggressive climate and clean energy initiative in the nation; New York is advancing an orderly and just transition to clean energy that creates jobs and continues fostering a green economy.

Thank you for the opportunity to submit comments on the EPA ENERGY STAR Draft 1 Version 3.0 Product Specification for Room Air Cleaners. We respectfully submit these comments for your consideration.

NYSERDA generally supports EPA’s updates to the Room Air Cleaner Specification

New York was one of several states to establish state appliance efficiency standards for room air cleaners¹ and NYSERDA also worked with the Association of Home Appliance Manufacturers (AHAM) and advocates to support the 2022 petition to the US Department of Energy (DOE) to adopt a federal appliance standard for room air cleaners.² We are supportive of EPA updating the air cleaner specification in order to recognize the top performing products.

NYSERDA is strongly supportive of EPA’s harmonization with the recent DOE test procedure and the shift in measured particulate. NYSERDA also appreciates EPA’s intention to expand the scope of coverage to

¹ New York established air purifier appliance standards in 2021: <https://www.nyserda.ny.gov/appliance-standards>

² <https://www.regulations.gov/comment/EERE-2021-BT-STD-0035-0016>

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better align with DOE's standard scope; however, we recommend that EPA consider aligning with the DOE lower limit of 10 cubic feet per minute (cfm). The PM_{2.5} metric, which is calculated based on dust and smoke clean air delivery rates (CADR), allows for measurement down to 10cfm per the AHAM AC-1 test procedure. While the pollen test only goes down to 25cfm, we recommend modifying the proposed reporting requirements to make the pollen reporting optional for products between 10 to 25 cfm. This will foster consistency for products between the federal standard and ENERGY STAR and ensure that the lowest cfm products are still efficient.

NYSERDA recommends additional considerations to support energy savings

In addition to updating the efficiency levels in V3.0, NYSERDA recommends that EPA consider mechanisms to facilitate the deployment of energy saving features such as sensors that shut off operations once the air is "clean." Such capability is offered as a feature by multiple manufactures,³ however information on whether a product has this feature is not universally available and is not currently listed on the ENERGY STAR listing. NYSERDA recommends EPA work with industry to support reporting of products with automatic shut off capabilities.

Additionally, NYSERDA recommends EPA consider establishing an equation-based efficiency level rather than the three bins as proposed. While the proposed sizes are consistent with the previous ENERGY STAR specifications and the federal standard, maintaining the three distinct bins may be a legacy framework that is no longer necessary. While the IEF increases as the CADR increases, the stepwise approach to increasing in efficiency may drive products to undersize in order to be recognized in a lower bin classification and therefore meet a lower efficiency level. For example, a manufacturer would face significantly higher efficiency requirements if their PM_{2.5} CADR increased from 99cfm to 101cfm; the 2% increase in CADR would drive a 23% higher efficiency requirement. An equation-based efficiency level would support a fair alignment of efficiency, size, and clean air delivery rate.

Thank you for the opportunity to provide comments on this rulemaking. NYSERDA seeks to be a strong partner of EPA as we work together to advance state and national decarbonization priorities. Please do not hesitate to reach out to discuss any of these matters further.

Sincerely,



Chris Corcoran
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New York State Energy Research and Development Authority (NYSERDA)

³ For example: <https://www.target.com/c/air-purifiers-home-appliances/automatic-shut-off/-/N-5xtusZ34lys>