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December 17, 2015

Via E-Mail

Abigail Daken
Product Manager, HVAC
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

dehumidifiers@energystar.gov

Re: ENERGY STAR Program Requirements: Product Specification
for Dehumidifiers, Eligibility Criteria, Draft 1, Version 4.0

Dear Ms. Daken:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Product Specification for Dehumidifiers, Eligibility Criteria, Draft 1, Version 4.0.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement, as long as product performance can be maintained for the consumer. We appreciate the opportunity to submit the following comments.

I. Effective Date

EPA did not specify an effective date for the Version 4.0 specification, but indicated during the December 3, 2015, webinar that it anticipates a late 2016 or early 2017 effective date. AHAM notes that the DOE test procedure that will be required in order to demonstrate compliance with

the next Federal energy conservation standard contains a significant change to the ambient temperature. Manufacturers are already working to understand the effect of those test procedure changes—it is evident that over the next several years, significant resources will need to be devoted to complying with the soon-to-be amended Federal energy conservation standards for dehumidifiers using the new test procedure. Significant consumer education will also be required as capacity declarations will change dramatically. It will be challenging for manufacturers to divert resources away from that effort in order to change current product lines to meet a new ENERGY STAR specification. If, however, EPA decides to move forward with Version 4.0 anyway, AHAM respectfully requests that the effective date for Version 4.0 be no earlier than October 1, 2016, and, preferably, 2017.

II. Test Procedure and Metric

EPA proposed to maintain the Energy Factor metric and reference the currently mandatory version of the DOE test procedure, Appendix X. EPA indicated that it plans to change to the Integrated Energy Factor and Appendix X1 in Version 5.0 of the specification which will have an effective date that aligns with the amended Federal energy conservation standards.

AHAM strongly supports EPA’s proposal to maintain the EF metric and use of Appendix X for Version 4.0 of the dehumidifier specification and not to adopt the new metric or test procedure until an effective date aligned with the amended Federal standards.¹ DOE’s standards and test procedures are, and should be, the foundation for the ENERGY STAR program. We agree with EPA’s proposal because it is consistent with the approach DOE takes to regulating covered products and acknowledges the extensive analysis DOE has done to formulate standards. Those standards are based on an analysis done using the mandatory test procedure. In addition, Federal government use of different metrics and test procedures causes confusion for consumers.

III. Eligibility Criteria

EPA indicated that it “evaluated consumer payback and found that in many cases the consumer will receive an immediate payback when purchasing a dehumidifier that meets the 2.00 EF level.” AHAM does not understand how any product could receive an *immediate* payback. EPA indicated during its December 3, 2015, webinar that it did not plan to share the underlying data supporting this statement. AHAM notes that, after several discussions with EPA in past years, it has become common practice in the appliance program for EPA to release such data in the spirit of transparency. AHAM does not understand why EPA would not make such data available here. Without that data, AHAM and other commenters cannot fully participate in the specification development process and cannot provide feedback on EPA’s claim that the proposed level will have an immediate payback. Accordingly, we can only comment that it does not seem possible that consumers could receive an immediate payback and we, thus, question the

¹ AHAM notes that, per DOE’s guidance dated August 25, 2014, early use of Appendix X1 is not yet permissible. That guidance makes clear “that manufacturers may voluntarily test and rate a basic model using an amended test procedure compliance date established when that test procedure is issued, only if the application of the amended test procedure and the sampling provisions demonstrate compliance with the amended standards. . . manufacturers may not begin using the amended test procedure during the period between the issuance of an amended test procedure final rule and the issuance of amended standards.”

accuracy of EPA's analysis. We respectfully request that EPA make that data available to all stakeholders as part of the Final Draft.

AHAM appreciates the opportunity to submit comments on the ENERGY STAR Product Specification for Dehumidifiers, Eligibility Criteria, Draft 1, Version 4.0, and would be glad to further discuss these matters should you so request.

Best Regards,

A handwritten signature in black ink that reads "Jennifer Cleary". The signature is written in a cursive, flowing style.

Jennifer Cleary
Director, Regulatory Affairs