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May 12, 2021

Ms. Tanja Crk
Office of Air and Radiation
Climate Protection Partnership Division
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Topic: ENERGY STAR® Water Coolers, Version 3.0 Specification, Final Draft

Dear Ms. Crk:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the United States (U.S.) Environmental Protection Agency (EPA) ENERGY STAR Version 3.0 Final Draft Water Coolers Specification.

The signatories of this letter, collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western U.S., serving over 32 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate this opportunity to provide the following comments about this Final Draft Specification for Water Coolers. In our previous comments on the Draft 2 Specification for this product, we compared EPA's data on the prevalence of high-capacity units to data present in the California Energy Commission (Energy Commission) Modernized Appliance Efficiency Database System (MAEDbS) dataset, we acknowledge and appreciate EPA's incorporation of MAEDbS data in its analysis, as seen in the re-adjustment of several capacity-cut points for both hot and cold units. We agree with EPA's recommendations for revised capacity categories, which we believe accurately partition the dataset.

We continue to be highly supportive of future EPA development of the On Mode Water Draw Performance methodology and believe this future metric development can bring the ENERGY STAR criteria more in line with field experiences of this product in high traffic scenarios.

In conclusion, we would like to reiterate our support for EPA's Final Draft Water Cooler Specification. We encourage EPA to finalize this draft and thank EPA for the opportunity to be involved in this process.

Sincerely,



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