ENERGY STAR Water Coolers Draft 2 Version 3.0 Comment Matrix

Topic	Stakeholder Comment Summary	EPA Response
General	Two commenters supported the proposed efficiency levels of 0.80 kWh/day for high capacity water coolers, and 0.68 kWh/day for low capacity water coolers.	EPA appreciates this comment.
Additional Fields for collection	One stakeholder requested that EPA collect additional data fields in the Qualified Product List, including cooling capacity, heating capacity, cooling system rated wattage, heating system rated wattage, cold water storage tank capacity, hot water storage tank capacity, and touchless water dispensing function.	EPA will be requiring reporting of cooling capacity and heating capacity but will not require reporting of the rated wattage for any specific sub-system as this is not information needed by a consumer or installer. Previously EPA proposed collecting the cold water and hot water storage tank volumes, however industry comments indicated that there is little to no variation in tank size. Partners may report features like touchless dispensing as Additional Product Information included in the ENERGY STAR Product Finder listing but EPA is not likely to offer an adder for this feature at this time.
Incorporation of ASHRAE 18 Standard	One stakeholder commented that the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) has withdrawn the ASHRAE-18-2008 standard. The stakeholder recommends that EPA work with manufacturers to reinstate this standard, or to develop definitions without referencing ASHRAE 18.	EPA's understanding is that the ASHRAE technical committee did not have an issue with the details of the test procedure. EPA confirmed with ASHRAE that the standard was withdrawn due to lack of industry participation in revisions and regulatory references. Should ASHRAE reconsider the standard, EPA would support the efforts of the technical committee in reviewing the test method and make resulting updates to the ENERGY STAR watercooler product specification. GEPA understands from stakeholders that this test is still widely used. As capacity measurements are based on the specific test and not an inherent property of the product, EPA is maintaining the reference to the ASHRAE 18 standard in the definitions for high and low capacity water coolers.
Savings from Cook Water Temperatures	A commenter recommends that EPA address energy savings from cook water draws in the On Mode Performance test methods.	The Final Draft specification proposes minimum efficiency levels for the On Mode with No Water Draw metric only; savings will be calculated from the On Mode with No Water Draw values only. At this time, EPA is not setting efficiency levels for OMP for cold water draw and OMP for hot water draw. As the idle mode energy for hot, cook, and cold models is expected to be the same as the idle mode energy for hot and cold models, there is no difference in energy savings between these categories based on the ENERGY STAR criteria. Future specifications that set efficiency levels for OMP for cold water draw and OMP for hot water draw may incorporate varied use schedules and temperature draws to predict energy savings.