

October 20, 2016
Via Electronic Mail



Melissa Fiffer
ENERGY STAR Appliances
U.S. Environmental Protection Agency

Re: EPA Most Efficient Clothes Dryer Specification (Electric and Gas)

Melissa,

NEEA supports EPA's choice to modify the criteria for evaluating the "most energy consuming" criteria to capture the highest dryness setting within the normal cycle. In our testing we attempted to use other criteria, but similarly struggled with finding the cycle that is most intensive. Focusing on highest dryness setting highlights the accuracy of the machine to determine when the clothing is really dry. Our data shows that this final "overdrying" is fairly common and is a key differentiator between reasonably energy efficient machines and very energy efficient machines.

The Most Efficient (ME) designation is useful to consumers and manufacturers. Four manufacturers have introduced products into the US market that can meet the ME designation. Without the ME designation consumers would not have the EPA confirmation which technologies are top performers, and manufacturers will find it more difficult to recover the development and tooling costs of introducing more efficient technologies.

Best Regards,

A handwritten signature in black ink, appearing to read "Christopher Dymond".

Christopher Dymond
Sr Product Manager – Electric Dryers
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P.S. Your dryer webpage has a pie graph (see right) in which the clothes washer piece includes dryer and water heating energy. The graphic should be revised to avoid giving the impression that washer + dryer energy = 1359 kWh/yr. Clothes washers themselves only use less than 100kWh/yr, but because they rely on both water heaters and clothes dryers the DOE metric generates a much larger value.

