



December 7, 2018

RE: ENERGY STAR® Version 5.0

Dear Ms. Daken,

We believe further consideration needs to be given to your definition of portable dehumidifiers. Rather than going with a one size fits all solution for every portable dehumidifier over 50 ppd., why not use case volume? This will challenge manufacturers to minimize space in one scenario and maximize technology in the other scenario. If the version 5.0 standards of greater than or equal to 3.31 L/kWh were implemented, the vast majority of the current ENERGY STAR dehumidifiers would be eliminated. Currently in the 54 - 75 pint per day category, there are 165 certified dehumidifiers. Given the proposed standards, none would qualify. In the 75+ pints per day category, there are 41 dehumidifiers and only 4 would pass the new guidelines. All 4 dehumidifiers are made by the same manufacturer and retail for over \$2,000 (per <https://www.energystar.gov/productfinder/product/certified-dehumidifiers/results>).

We sell many dehumidifiers for crawlspace applications. Smaller is often better to allow access through the crawlspace door in addition to making it easier to position the unit in a shallow crawlspace. Many basement owners would prefer a dehumidifier that blends into the background rather than take over a room with a massive unit. As a manufacturer of three crawlspace/basement units with a case volume of under 1.8 cubic, we would like to see a reward for packaging innovation in the portable category as well. We think that perhaps a differentiation in over and under 3.5 cubic foot would be practical.

Thank you for considering our comments,

Rob Clemens

President, Seaira Global LLC