



July 14, 2020

RE: 3.0 ENERGY STAR Water Cooler Product Specifications

Dear Tanja,

On June 2, 2020, EPA released the Draft 1 Version 3.0 ENERGY STAR Water Cooler Product Specifications and requested comments from stakeholders. Water Quality Association (WQA) hereby submits its formal comments. WQA is a not-for-profit representing the residential, industrial and commercial drinking water treatment industry. We have approximately 2500 member companies, many of which are small family owned businesses that install, service and maintain water coolers.

First, WQA recommends that the EPA set the ENERGY STAR 3.0 water cooler energy use specification at 0.80 kWh/day, which is an eight percent decrease from the current ENERGY STAR 2.0 standard. This will be a significant improvement over the current ENERGY STAR 2.0 energy use specification and will preserve consumer preferences related to convenience (e.g., how long the unit will take to heat or cool water, and how long it will maintain water at a desired temperature), while meaningfully enhancing energy efficiency.

WQA also believes that the implementation period for ENERGY STAR 3.0 should be lengthened from 9 months to 12 months. Additional time is required for manufacturers to perform engineering, compliance and certification studies, and in some cases, to source new suppliers necessary to comply with the proposed ENERGY STAR 3.0 specifications.

In addition to meeting the ENERGY STAR specifications, water coolers that currently carry the ENERGY STAR label are designed to be durable and reliable. These are important design features for owners and users. It is particularly important for the many small family-owned businesses who install, own, service and maintain these units with small businesses, homeowners and consumers in the field. Therefore, since EPA specifications state "a product model shall meet the ENERGY STAR specification in effect on the model's date of manufacture," **it is critically important for EPA to clarify that these small family-owned businesses can clean, sanitize, or refurbish existing water coolers that had met ENERGY STAR requirements at the time of manufacture and place those units back with consumers as ENERGY STAR certified.**

Sincerely,

A handwritten signature in cursive script, appearing to read "David Loveday".

David Loveday
Global Government Affairs Director
Water Quality Association