



**Therma-Stor** LLC

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December 15, 2015

RE: Therma-Stor LLC comments on Standards for Residential Dehumidifiers  
Draft 1 Version 4.0 ENERGY STAR Dehumidifier specification

To whom it may concern,

Therma-Stor manufactures residential dehumidifiers, including the Santa Fe line of free-standing dehumidifiers and the Ultra-Aire line of whole house ventilating dehumidifiers. The following comments are respectfully submitted on behalf of Therma-Stor LLC.

We support the draft proposal of the version 4.0 specification.

We feel the <75 pint/day category will benefit from the proposed EF increase to 2.0 Liters/kWh. This increase will allow the more efficient products in the category to remain in the program while removing a substantial number of lower efficiency products from the program. This change will help consumers identify the most efficient products in the category.

We believe maintaining the ≥75 pint/day category EF at 2.8 Liters/kWh is proper and reasonable. There are fewer products currently available in this category and a substantial increase in the EF level requirement would remove many of the products from the program. The products in this category compete directly with the smaller capacity residential dehumidifiers in the marketplace and the products in this category continue offer substantially better operational efficiency than the products in the <75 pint/day category.

We are aware of the Appendix X1 test method and the IEF metric developed by the DOE. The measured capacity and efficiency (IEF) are substantially reduced compared to the current Appendix X method and metric (EF). We recommend that the Energy Star 5.0 specification be substantially revised to accommodate these changes.

Sincerely,

Tim O'Brien  
Business and Product Development  
Therma-Stor LLC