

February 24, 2016

Via E-Mail

Katharine Kaplan
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

appliances@energystar.gov

Re: ENERGY STAR Program Requirements
Product Specification for Clothes Dryers, Proposed Version 1.1

Dear Ms. Kaplan:

BSH Home Appliance Corporation respectfully submits the following comments on the ENERGY STAR Product Specification for Clothes Dryers, Proposed Version 1.1.

BSH Home Appliance Corporation is headquartered in Irvine, California, and manufactures appliances sold under the Bosch, Thermador and Gaggenau names. BSH has factories in North Carolina and Tennessee, with warehouses, sales offices and show rooms throughout the United States.

BSH supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for energy efficiency improvement; as long as product performance can be maintained for the consumer and the program changes can be cost justified.

In general, BSH supports the comments made by AHAM. In addition to the AHAM comments we feel the following statement included in the Product Specification needs clarification and/or modification.

Clothes Dryer with Supplementary Drying System: A consumer product that meets the definition of an Electric or Gas Clothes Dryer and includes a supplementary drying system in the same housing as the primary dryer. The primary dryer and the supplementary drying system are powered by a single electric power source. The supplementary drying system has a rated input power that is less than 15% of the primary dryer's rated input power and draws no discernible power when not in use.

1. The definition include gas dryers, but then limits it to electric with the “single electric power source” statement. The scope is unclear.
2. As stated, a supplementary drying system having a rated input power of less than 15% of the primary dryer's rated input power would include a multistage electric heating element arrangement where one stage of the heating element is below 15% of the primary dryer's rated input power. Multistage electric heating element arrangements are already being certified to the Energy Star requirements. Intent of proposal is not clear.
3. How was the 15% limit for the supplementary drying system rated input power derived?

Best Regards,
Respectfully Submitted,
Manfred Staebler
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Vice President Government Affairs (RNA/MK-GA)
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