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Ms. Tanja Crk
Product Manager
ENERGY STAR
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: IBWA Comments on 2nd Draft of ENERGY STAR 3.0 Specifications for Water Coolers

Ms. Crk:

Thank you for this opportunity to provide feedback on the U.S. Environmental Protection Agency's (EPA) second draft of ENERGY STAR 3.0 specifications for water coolers. The International Bottled Water Association (IBWA) appreciates your willingness to listen to, and work with, bottled water industry partners during this process, and we are supportive of the progress made on 3.0 specifications to date.

IBWA supports EPA's efforts to create separate categories with different energy use specifications based on the capacity of units in the market. As noted in the EPA second draft on water cooler specifications for ENERGY STAR 3.0, first draft specifications would have excluded large-capacity coolers that serve a large portion of the market. This differentiation will provide the industry a better opportunity to meet the customer demand for ENERGY STAR certified products. In addition, as customers have come to expect a certain level of performance from their water coolers, this differentiation will help ensure that customers continue to value the ENERGY STAR brand and seek to include these coolers in their homes and offices across the country.

IBWA also supports the separate energy use specifications for high- and low- capacity coolers. As noted in our previous comments, IBWA was concerned that an energy use specification of 0.70 kWh/day would exclude many highly energy efficient hot- and cold-water cooler models currently in service that are built to last, often maintaining their energy efficiency in the marketplace for 10-12 years. In addition, IBWA was concerned that the 0.70 kWh/day specification may not have been readily accepted by customers as it would not meet their preferences, which included how long the cooler takes to heat up or cool down, and how long it can produce water at the desired temperatures. This could have led to fewer people seeking ENERGY STAR certified water cooler products.

IBWA appreciates EPA's understanding of this concern and fully supports the proposed new specifications of 0.80 kWh/day for high-capacity coolers and 0.68 kWh/day for low-capacity coolers. This will help ensure that EPA ENERGY STAR specifications push manufacturers to improve the energy efficiency of their products, while still meeting consumer preference.

IBWA requests that one change be considered regarding the metric used to define high- and low-capacity coolers that dispense cold water, as well as a clarification on how high- and low-capacity coolers are categorized by that metric. Specific to coolers that dispense cold water, the second draft specification defines a high-capacity water cooler as "a water cooler with a cold-water dispenser capacity of at least 0.61 gallons per hour" and a low-capacity cooler as "a water cooler with a cold-water dispenser capacity of 0.61 gallons per hour." IBWA suggests that the 0.61 gallons per hour metric used to define cold-water dispenser capacity be changed to 0.50 gallons per hour. The 0.61 gallons per hour metric erroneously suggested by the industry stems from an attempt to provide to EPA a suitable definition for cold-water dispensers. The error comes from translating an often-used guideline (based on Air-Conditioning and Refrigeration Institute, or ARI guidelines) into a definition for EPA to consider for high- and low-capacity water coolers. The correct metric of 0.50 gallons per hour is in line with ARI guidelines that the industry has used as a basis for capacity for many years now and was our working assumption when we provided EPA staff with feedback during the ENERGY STAR 3.0 drafting process. With this in mind, IBWA urges EPA to change changing the metric used to define both high- and low-capacity cold water dispensers from 0.61 gallons per hour to 0.50 gallons per hour.

In addition, IBWA seeks clarification on the capacities used to define both high- and low-capacity coolers that offer cold water. Per the definitions included in the second draft, high-capacity coolers have a dispenser capacity of at least 0.61 gallons per hour, and low-capacity coolers have a dispenser capacity of 0.61 gallons per hour (and should EPA adopt IBWA's suggested change, 0.61 would be replaced with 0.50). If high-capacity is at least 0.61 (0.50) gallons per hour, which means it could also be higher, should low-capacity be defined as being below 0.61 (0.50) gallons per hour? If this is correct, IBWA suggests altering the low-capacity definition to say "a water cooler with a cold-water dispenser capacity lower than 0.61 (0.50) gallons per hour" as the definition for high-capacity cold water coolers would encompass those at or above 0.61 (0.50) gallons per hour.

Thank you again for your efforts to work with the bottled water industry regarding EPA ENERGY STAR 3.0 specification for water coolers. We appreciate your continued focus on working with the industry and we look forward to continuing our work on these specifications, in anticipation of the final specifications being implemented early next year.

Sincerely,



Cory Martin
IBWA Vice President, Government Relations