

## ENERGY STAR Water Coolers Draft 1 Version 3.0 Comment Matrix

Topic	Stakeholder Comment Summary	EPA Response
General	Commenter expressed support of the scope, test method, and potential long-term inclusion of testing water cooler products with draws.	EPA appreciates the commenter's support of this specification.
Scope Expansion	Commenter supports the expansion of scope to include products with additional dispensing capabilities, such as sparkling, alkaline, and/or flavored water. Commenter noted that these additional functionalities would be expected to primarily operate during a draw, so they would be expected to have no impact on standby power consumption.	EPA appreciates the commenter's support of this change.
Unit Capacity	Commenter recommended having tiers of levels for certification, where the base certification had a kWh limit only and the higher levels would consider kWh and output capacity.	EPA does not anticipate having tiers of certification for this product category but does appreciate that the energy consumption will vary with the conditioned water capacity of the unit. The Draft 2 requires the reporting of hot and cold water capacity per ASHRAE Standard 18, and has two distinct categories for low and high capacity water coolers for the hot and cold (as well as hot, cook, and cold) conditioned storage units.
OMP Data Reporting	<p>Two commenters supported incorporating the On Mode Performance (OMP) test procedure measurement points. One commenter notes that the current test procedure does allow for direct comparison of products but may not reflect user energy consumption with the product in the field.</p> <p>The other commenter states that a reporting requirement is not a strong enough stance and recommends including both the energy consumption and the capacity or output of the unit in setting levels.</p>	EPA appreciates these comments and has included the reporting requirements for the OMP as well as the hot and cold water capacities. EPA recognizes that the capacity will affect energy consumption, and so has proposed low and high capacity categories with distinct energy efficiency requirements for the hot and cold (as well as hot, cook, and cold) conditioned storage units.
Connected features	Commenter supports inclusion of connected capabilities as has been done in other ENERGY STAR specifications, including allowing a moderate limit to balance the energy efficiency with product innovation. Another commenter encourages EPA to acknowledge touch screen and digital interfaces, which enable customers to customize settings such as set temperatures, modes, and dispensing limits.	EPA intends to monitor products with connected and touch screen features by including reporting for these features in the QPL.

Hot, Cook, and Cold Units	Commenter recommends that EPA evaluate the potential benefits from Hot, Cook, and Cold units as they allow consumers to dispense room temperature water, and suggests including a room temperature water draw test.	The “Hot, Cook, and Cold Unit” definition has been added to the specification, which will allow these units to be identified in the Product Finder and Qualified Product List. However, a room temperature water draw test is anticipated to result in zero or near zero energy draw, so an OMP could not be calculated for this test and would not differentiate between Hot, Cook, and Cold units.
Alternative Refrigerants	Commenter supports the collection of data on alternative refrigerants. Commenter further suggests that EPA incorporate refrigerant release impacts into the product analysis for water coolers and other consumer white goods.	EPA appreciates the feedback received from this commenter. Though ENERGY STAR cannot require the use of specific refrigerants, the program supports alternative refrigerants currently <a href="#">listed as acceptable</a> for this end use under the EPA’s SNAP program. At this time, the EPA does not intend to incorporate refrigerant release impacts.
Implementation period	Two commenters requested that the implementation period between the publication of the final draft and the effective date of the specification 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.	The 9-month period between the publication of the final specification and its effective date is standard across products and is intended as a transition period during which partners update collateral materials versus re-engineer products.
ENERGY STAR 2.0 Certified Units	Commenter requests clarification on whether water coolers that are currently in the field and certified to ENERGY STAR will remain certified. Commenter notes that many small operations must be able to clean or refurbish water coolers and place those units back with existing consumers as ENERGY STAR certified products.	EPA understands that water coolers certified to Version 2.0 will remain in circulation (i.e. cleaned and redeployed) for some time after the effective date of the new specification. As such, EPA does not require that the label on those units be covered up or removed, but to the extent new units are placed after the effective date, those must meet the new Version 3.0 requirements in order to be labeled.  Once the Version 3.0 specification takes effect, only those water cooler models that meet the new criteria and have been third party certified by an EPA recognized certification body will remain on the ENERGY STAR Product Finder.