



December 5, 2018

Via E-Mail
Robert Burchard
U.S. Environmental Protection Agency

roomaircleaners@energystar.gov

Re: ENERGY STAR Room Air Cleaners Version 2.0 Specification Discussion Guide

Dear Mr. Burchard:

Please accept our comments on the ENERGY STAR Room Air Cleaners Version 2.0 Specification Discussion Guide from October 2018.

As a significant marketer of Air Cleaners in the U.S. and Canadian markets and a key stakeholder of the ENERGY STAR program, we will be greatly impacted by revisions made to the ENERGY STAR Room Air Cleaners Specifications. I have personally been involved in the Air Cleaner industry since 2005 and have been a key supporter of the ENERGY STAR program; working hard to develop efficacious products that qualify for the program over the past 15 years. In fact, I have spoken at an ENERGY STAR conference, encouraging other stakeholders to actively participate in and promote the ENERGY STAR program. It is with continued interest in supporting the continued success of the program that I submit comments on the referenced Specification Discussion Guide.

SUMMARY

We support the EPA and the Department of Energy (DOE) in their efforts to provide incentives to retailers and consumers for energy efficiency improvement. Our company takes great effort to support continued development of energy efficient products and are proud of the advances that we've made in the last several years. While we highly support manufacturing and marketing energy efficient products, our guiding principle has been based on ensuring that we provide consumers with highly efficacious products. As such, we want to ensure that standards and proposed adjustments continue to support the assurance that product performance can be maintained for the consumer.

- a. We support a change from dust CADR to smoke CADR as the program requirement. Smoke is used to calculate room size because of its extremely small (.09 to 1.5 μm) size and because it is a common global indoor pollutant. Even if a consumer does not smoke in the home, it can be a surrogate for much smaller fine particles that may commonly be found in the home (and is much smaller than pollen and typical household dust). Also, it is our recommendation to require measurement of only one particle type which helps us manage the test burden. We believe that smoke is the best and only necessary particulate to use to set the ENERGY STAR qualification criteria.

- b. We are concerned about the consideration of possible deviations from AHAM/ANSI AC-1 as it relates to the specification revision and instead, would urge you to join us in AHAM's task force where we work together as an industry to revise standards.
- c. Additionally, in general, we would like to encourage the EPA to limit revisions to those that maintain the strategic vision for the ENERGY STAR program, which is to reduce greenhouse gas emissions by removing barriers in the market that deter consumers from purchasing the most energy-efficient product model that otherwise meets their needs. We feel strongly that the ENERGY STAR program must focus only on energy efficiency and not create design, performance, or other requirements as qualifiers for program qualification (i.e., noise requirements, filter requirements, etc.)

Our detailed response by section is as follows:

III. Scope

We believe that no changes to the scope (product exceptions) should be made as proposed until an industry standard for definition and measurement is created for "harmful by-products".

IV. Efficiency and Performance

ENERGY STAR Qualified Product List (QPL) Efficiency Assessment

The data in the chart shown only reflects air purifiers which meet the ENERGY STAR requirement and does not factor in shipment weighting that would include non ENERGY STAR models. As a result, it is not valid to project a trend line which could be used to adjust the requirement. We disagree that the data presented demonstrates that there is a trend toward greater efficiency.

Technological Advancements

While motor type may have a substantial impact on the efficiency of an air purifier, there can and will be other contributing factors. Focusing on motor type or any other product configuration will severely limit product design options. We strongly encourage EPA to not set criteria that would require use of a specific technology or dictate design. We would like to have the ability to decide which technology and design options we choose to meet eligibility requirements. Additionally, intellectual property rights could cause limitations for some manufacturers to have the ability to secure technology options that may be required in meeting eligibility requirements, putting them at an even greater competitive disadvantage.

Network-Connected Products

In response to the request for manufacturer feedback on the prevalence of connected and sensor featured devices, we have a limited offering of each. At present, the cost of the product offerings of connected devices and those with sensors prohibit the products from becoming mainstream. We continue to work on technology advancements that would benefit all consumers in all income brackets. We encourage EPA to not include criteria that would impede innovation in Network Connected Products, including increasing the stringency of standby levels. Not only could this inhibit innovation and responding to consumer demand for certain features, it could also limit overall increases in efficiency.

Product Size

Basic material requirements of larger air cleaners make them more expensive to manufacture. If EPA sets levels that are too difficult for smaller air cleaners to meet, it is our belief that lower income families may not be able to afford to purchase ENERGY STAR qualified air cleaners.

CADR

As noted earlier, we support making smoke the only particulate for setting ENERGY STAR qualification criteria.

Filter Performance

We do not believe that EPA should require a specific filter type or filter efficiency to ship with products to qualify for ENERGY STAR. CADR is not dependent on any particular filter or technology. We feel strongly that we should have the ability to decide which filter type, efficiency, technology and design options we choose to meet eligibility requirements. As noted earlier, we ask that the ENERGY STAR program focuses only on its primary mission to drive energy efficiency and should not dictate product design.

Fan Noise

We feel strongly EPA should not mandate performance levels such as noise levels in the specifications. We believe that the product design and performance levels should be left to the manufacturer to determine how best to meet the needs of the market. We do not believe that the scope of the ENERGY STAR program should extend beyond energy efficiency, especially when it comes to noise levels which are very subjective based on user preference. We also believe that establishing a sound requirement could negatively impact the primary purpose of the air clean which is to effectively clean the air.

V. Market Assessment

Total shipment data should be a factor in the determination of program revisions vs. solely evaluating the number of available ENERGY STAR qualified models.

VI. Testing

We encourage EPA to use the established AHAM AC-1 standards vs. making revisions to test requirements in the context of an ENERGY STAR specification revision. As noted earlier, we would encourage engagement with AHAM to participate in standard revision efforts via an open AHAM task force. This would provide you with broader perspective and additional context and give you the opportunity to raise any issues and concerns for discussion.

We appreciate the opportunity to submit comments for consideration.

Sincerely,

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