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Tanja Crk
Product Manager
ENERGY STAR Commercial Food Service, Vending, Water Coolers
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

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

Ms. Crk:

The International Bottled Water Association (IBWA) is pleased to provide the U.S. Environmental Protection Agency (EPA) with comments regarding the *Draft 1 ENERGY STAR Version 3.0 Water Cooler Specification*, issued on June 2. We appreciate your willingness to work with the industry to adopt specifications that will both meet ENERGY STAR goals and ensure customer acceptance of ENERGY STAR certified coolers.

IBWA represents all segments of the bottled water industry, including spring, artesian, mineral, sparkling, well, groundwater, and purified bottled waters. Founded in 1958, IBWA represents over 700 United States and international bottlers, distributors, and suppliers, including water cooler manufacturers. In addition, many IBWA members are small and multi-generational family owned companies. The home and office delivery (HOD) segment of the industry, who rent or sell bottled water coolers, generate approximately 7400 direct jobs and are responsible for \$4.6 billion in economic activity.

The proposed draft ENERGY STAR 3.0 specifications include a new standby energy consumption standard for hot and cold storage type water coolers that is nearly twenty percent (20%) lower than the current standard. Based on EPA data, sixty-eight percent (68%) of currently certified water cooler models will not meet the new product specification.

This new standard would negatively impact the HOD segment of the bottled water industry. We therefore request that EPA take the following actions, which would help reduce the burdensome requirements of the new standard:

- Revise the specification standard to better align it with consumer preferences
- Provide additional time for cooler manufacturers to meet new ENERGY STAR 3.0 specifications
- Clarify that water coolers manufactured before the new ENERGY STAR 3.0 specification becomes effective are still compliant with ENERGY STAR 2.0 specifications and remain certified

Revise the Energy Consumption Specification to Align with Consumer Preference

The proposed new standby energy consumption standard for hot and cold storage type water coolers is ≤ 0.70 kilowatt hours per day (kWh/day), which is nearly twenty percent (20%) lower than the current standard of 0.87 kWh/day. If the standby energy consumption standard is lowered to 0.70 kWh/day, EPA will 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.

The current ENERGY STAR 2.0 specification already reduced water cooler energy consumption by 27%. The proposed new standard, which would require an additional 20% reduction, will not readily be accepted by consumers because the water coolers will not meet their preferences. These preferences include how long the cooler takes to heat up or cool down, and how long it can produce water at the desired temperatures. Setting an ENERGY STAR specification without considering consumer preference or acceptance will lead to fewer people seeking ENERGY STAR certified water cooler products.

We therefore request that EPA set the new ENERGY STAR 3.0 water cooler energy use specification at 0.80 kWh/day, which is an eight percent decrease from the current ENERGY STAR 2.0 standard. This would meet the goal of the EPA ENERGY STAR program and continue to provide coolers that satisfy consumer preferences. Our suggested energy use rate would still be difficult for the industry to achieve, but we believe it is a specification that can be met with adequate implementation time.

Several new types of water coolers are coming onto the market to meet changing consumer preferences and demands. This includes coolers that offer adjunct systems, such as sparkling water and Internet of Things (IoT) options. EPA will be gathering energy consumption data once the ENERGY STAR 3.0 specification goes into effect. This will include information about these new types of coolers. Until more data is collected on these new types of coolers and uses, we suggest that EPA not seek to establish new ENERGY STAR specifications for these new offerings. Instead, when determining compliance with ENERGY STAR 3.0 for coolers with these new options, we suggest that EPA test the base unit with the adjunct systems in the dormant stage (not standby).

More Time is Needed to Introduce Coolers to Meet New ENERGY STAR 3.0 Specifications

EPA's timeline suggests that water cooler manufacturers will have nine months to implement a new energy consumption specification that is 20% lower than the current standard. As mentioned earlier in our comments, we believe that EPA should set a more reasonable standard of 0.80 kWh/day. However, even this more reasonable requirement would be difficult and costly to comply with in only nine months. Additional time is required to develop and implement technologies necessary to meet any new standard. This includes performing engineering and compliance studies and sourcing new parts and components. For any product involving new technology, it is not uncommon to need 16-18 months of development time to roll out a new product. While the draft proposal does give the industry an idea on what new specifications to expect, more time is needed to develop coolers that continue to meet customer preferences. We therefore request that EPA provide 12 months for manufacturers to meet the new ENERGY STAR 3.0 specification.

Clarify that the Manufacturing Date Allows Coolers Produced Before ENERGY STAR 3.0 is Enforced Continue to be ENERGY STAR Certified

IBWA seeks clarification regarding coolers currently in service in the industry. Most water cooler models are designed and maintained to be used for upwards of 10-12 years. These units are often cleaned and reconditioned by water cooler manufacturers and distributors after many years of use and are then placed back into the market for additional years of service.

Under the existing ENERGY STAR 2.0 specification, a cooler that was manufactured before the implementation date and met ENERGY STAR 1.0 specifications retained its designation (with a sticker on the unit) while in operation at an existing customer's home or office. The industry supports this concept and urges EPA to adopt a similar provision for the ENERGY STAR 3.0 water cooler specification.

The proposed ENERGY STAR 3.0 specification for water coolers states that *"a product model shall meet the ENERGY STAR specification in effect on the model's date of manufacture. The date of manufacture is specific to each unit and is the date on which a unit is considered to be completely assembled."* Consistent with the process followed by EPA when issuing ENERGY STAR 2.0, we ask EPA to make it clear that a distributor can remove a cooler from the office or home of an existing customer so it can be cleaned or refurbished, and undergo any necessary maintenance and the cooler will still retain its ENERGY STAR certification. In addition, that cooler can then be reinstalled or replaced with another cooler of the same make and model in the office or home of an existing customer.

If an existing customer requests that their coolers all meet ENERGY STAR 3.0 specifications, the distributor would replace all coolers under the contract with coolers that comply with the new specifications. It could then refurbish the ENERGY STAR 2.0 coolers to make them compliant with the new standard, or clean and use these coolers to replace other ENERGY STAR 2.0 compliant coolers with an existing customer that has not requested ENERGY STAR 3.0 coolers.

Water cooler manufacturers have been ENERGY STAR partners for many years. These companies are continually improving the efficiency of their products by reducing the mixing of hot and cold water in units, improving insulation around water tanks, and offering units that heat water on demand. The industry strives to be a leader in environmental and sustainability initiatives, and strongly supports the ENERGY STAR program.

We look forward to working with you as new ENERGY STAR 3.0 specifications are revised and finalized in the coming months.

Regards,

INTERNATIONAL BOTTLED WATER ASSOCIATION

A handwritten signature in black ink, appearing to read "Cory Martin", with a horizontal line extending to the right.

Cory Martin
Vice President, Government Relations