



Katherine Kaplan

ENERGY STAR Product Development and Program Administration

1200 Pennsylvania Avenue

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Washington, DC 20460

Ms. Kaplan,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program to the proposed updates to the Clothes Dryers 1.1 specification revision. After careful review of the proposal, NEEP, respectfully submits the following comments.

In general, NEEP is in full support of the expansion of the dryers specification to include units with supplemental drying systems. This change will improve the potency of this important specification. The ENERGY STAR specification for Dryers has become a critical component for efficiency programs throughout the Northeast and Mid-Atlantic, as well as nationally through inclusion into programs such as the ENERGY STAR Retailers Products Program (RPP). In addition to significant rebates being offered on ENERGY STAR Dryers in individual programs,¹ the RPP program is pulling together national partnerships between retailers and program administrators to truly transform the retail products market. 2016 RPP participants represented 11 states and nearly 15% of the US population,² and 2017 participation is growing. With ENERGY STAR Dryers as a cornerstone technology for the RPP program, the existence and strength of this specification is critical.

Additionally, as hybrid and full heat-pump dryers become more readily available (partially in reaction to the ENERGY STAR Most Efficiency criteria), there is a need for ENERGY STAR to continue to take a close look at this product category for any potential revisions. This is a category ripe for market transformation, and there is a firm need for ENERGY STAR to diligently watch it for specification updates. Stakeholders involved in the RPP program as well as efficiency stakeholders more generally can serve in support capacities for additional analysis to retain the viability of this specification and subsequent updates.

Overall, this specification in general and the 1.1 revision in particular are pivotal to the success of programs such as RPP which has national retailer support, as well as continued viability for utility

¹ 2016 List of Northeast Programs offering incentives on ENERGY STAR Dryers:

http://neep.org/sites/default/files/resources/Northeast_Appliance_Incentive_Summary.pdf

² More information: <https://www.energystar.gov/ESRPP>



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programs that are anticipating major changes in their potential retail savings as the residential lighting market transforms. ENERGY STAR is and must continue to serve in a role of a leader in recognition of high performing products, and NEEP looks forward to continuing to support ENERGY STAR's efforts into the future.

Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP to provide comment to the Dryers 1.1 specification revision. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', written in a cursive style.

Claire Miziolek
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