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ENERGY STAR for Room Air Cleaners  
US Environmental Protection Agency Office of Air and Radiation  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

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Mr. Burchard,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program on the guidance document for room air cleaners specification revision version 2.0. This letter is a supplement to the combined comments submitted on behalf of participants in the ENERGY STAR Retail Products Platform. After review of the proposal, NEEP respectfully submits the following comments.

#### **Overarching Comment: Urgency in Completion**

In general, NEEP is incredibly supportive of ENERGY STAR's attention to this product category and urges this specification revision process to remain a top priority. This product category has been identified by EPA as one up for revision for several years, as the V 1.2 specification has been in place since July 2004. Over the past 14 years, there have been advancements in the technology that warrant a specification revision. Room air cleaners are a growing category to address indoor air quality and as of March 2017, the AHAM database showed that 60% of available models were ENERGY STAR compliant, far above the typical ENERGY STAR target rate of 25%.

In 2018, several states, including Rhode Island and Washington, pursued new legislation to set state-level appliance efficient standards for room air cleaners/air purifiers based on the 2004 ENERGY STAR levels. This reflects both the out-of-date nature of the current ENERGY STAR Specification as well as the great energy savings potential of this product category. Though new standards were not adopted in either state in 2018, several additional states are considering appliance standards for air purifiers in 2019. This further underscores the necessity for a new 2.0 specification to be completed in a timely manner.

#### **Support the effort to address new metrics**

According to Consumer Reports, testing has found that the cheapest air cleaners do no better at cleaning air than having no air cleaner at all. While energy reduction is the primary goal of an ENERGY STAR specification, if an air purifier uses less energy but does not effectively clean the air, it will be using more energy than nothing at all for potentially no benefit. The range of manufacturer claims and



different mechanisms such as types of filters used to clean air currently shows the need for a more thorough addressing of cleaning metric for this category. NEEP encourages EPA to continue to seek data on the expanded CADR requirement to include smoke and pollution as well as addressing filter performance.

### **Connectivity**

Connected functionality is being installed in many consumer end use products, such as HVAC, laundry, and refrigeration, including room air cleaners. While there may not be as large an opportunity for load shifting benefits from air cleaners as there would be for a larger energy end use, smart functionality is being incorporated into more and more air cleaners, and NEEP encourages EPA to consider adopting optional connected criteria for this product category. The potential to connect to a smart indoor air quality monitor or anticipate poor air quality days could be amenity that consumers start to seek, and by setting energy efficiency bounds around that connected functionality, ENERGY STAR could ensure that for customers seeking a smart room air cleaner that they also have an efficient one.

Thank you for offering the opportunity for NEEP to provide comment to the V2.0 Discussion Guide for the Room Air Cleaners specification. ENERGY STAR is and must continue to serve in a leading role in recognition of high performing products, and NEEP looks forward to continuing to support ENERGY STAR's efforts into the future. 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', with a horizontal line extending from the end of the signature.

Claire Miziolek  
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