

Regarding EnergyStar Version 3.0 Draft Review

Background and Industry Trends

Natural Choice has been in the water cooler design, manufacturing, and sales market for nearly 30 years and has witnessed an encouraging rise in popularity of POU coolers throughout that time. The consumer market is increasingly cognizant of their water quality, taste, and additional dispense options beyond traditional Cold water. The biggest trends in the industry that we see now include:

- Performance & Market Segmentation - a great analogy here is the refrigerator market, where consumers are always seeking different functionality, sizes, and ultimately these all require different electrical usage. We see a similar pattern in the water cooler industry – from basic mass market units to high performance products. In our market segment, we see that consumers want performance: the coldest cold water, the hottest hot water, excellent quality sparkling water. If the product does not offer it, the EnergyStar label is really a secondary factor.
- Technology/User Interface- more and more appliances are changing to touch screen/digital interfaces that allow consumers more customization and interaction than traditional buttons and switches. This natural evolution now facilitates the ability of users to easily set water temperatures, energy saving or idle modes, dispense limits, etc. without having the technical expertise needed to change mechanical configuration or settings.
- Sparkling/Carbonated water- this has been an upward trend in the soft drink industry and is carrying over into POU coolers.

Comments to Version 3.0 Draft and Associated Test Method

The requirement to report OMP data is a step in the right direction, however we feel it does not take a strong enough stance regarding performance. If certification does not take into account the output level of the machine, then manufacturers of high-performance products are immediately at a disadvantage in the program. Efficiency should be a relative measure that considers both the energy usage AND the performance level (capacity/output) of the product – in this case, kWh's and BTU's are really the measurements that create an efficiency paradigm that is far more useful than simply minimizing kWh's.

Perhaps an intermediate step could be the option to provide tiers or categories for EnergyStar listings, coinciding with the benefits attached. Having levels (I, II, III for example) with the first being a base certification (only kWh considered) and moving up to additional level gauged by output performance vs. kWh could allow for better distinction to the consumer compared to having to reference an OMP database through the EnergyStar directory.

The EnergyStar program should consider the increasing customization and simple UI functionality of modern appliances. Energy saving software features are disabled in the current test method- but why? Options like "sleep" or "idle" modes for example allow you to disable functionality when the product is not in use by the consumer, therefore saving energy that can balance out the usage and performance factors to be more inclusive of high-performing options. Like computers and TV's, any option to improve the output vs. kWh should be encouraged.

Ultimately, the goal of EnergyStar should be to steer consumers away from inefficient products and provide incentives to both manufacturers and consumers to produce/purchase the most efficient, marketable products. If the market demands performance, the standard and test method should reflect that realistic viewpoint to make it as relevant as possible to consumers, and therefore have the greatest effect.