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October 21, 2011

Via E-Mail

Abigail Daken
U.S. Environmental Protection Agency
ENERGY STAR HVAC Program
dehumidifiers@energystar.gov

Re: ENERGY STAR Program Requirements Product Specification
For Dehumidifiers, Eligibility Criteria, Draft Final, Version 3.0

Dear Ms. Daken:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Program Requirements Product Specification for Dehumidifiers, Eligibility Criteria, Draft Final, Version 3.0.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports the Environmental Protection Agency (EPA) and Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement. We continue to believe, however, that the ENERGY STAR eligibility criteria should not be written in such a way that could push some smaller capacity, less expensive products from the market.

I. Definitions

AHAM supports EPA's minor changes to the definitions for dehumidifier and basic model because those changes ensure that the ENERGY STAR definitions for those terms are identical to DOE's definitions.

AHAM reiterates the importance of maintaining harmonization with DOE at all times. In other words, as DOE definitions change, ENERGY STAR definitions must also change to mirror them. It is critical that EPA's requirements are consistent with DOE regulations and test procedures. To achieve consistency, the relevant definitions must be *identical* to each other *at all times*. (The best way to achieve this would be to cite the relevant definitions in DOE's regulations rather than to copy the current definitions into the ENERGY STAR specification). Without such consistency and uniformity there will be significant confusion for manufacturers and for consumers.

II. Energy Efficiency Requirements

EPA again proposes one level of energy efficiency requirement for dehumidifiers with a capacity of less than 75 pints per day to qualify for ENERGY STAR. Previous ENERGY STAR specifications have recognized several classes of dehumidifiers, each with its own eligibility level. For example, the current specification has five separate classes for products with a capacity of less than 75 pints per day—the specification lists different qualification levels for products with capacities of ≤ 25 pints per day, > 25 to ≤ 35 pints per day, > 35 to ≤ 45 pints per day, > 45 to ≤ 54 pints per day, and > 54 to < 75 pints per day.

As we commented on the first and second draft proposals, the proposed lumping together of these five product classes in the revised specification is unfairly biased towards larger capacity units, which will more easily meet the levels than smaller capacity units, especially given the large increase in efficiency from the current level that the new proposed level represents for smaller units. EPA appropriately takes pride in the ENERGY STAR program as a market transformation program, and AHAM members have long brought to market the most energy efficient products. But EPA should not use the ENERGY STAR program to push products out of the market, such as lower capacity dehumidifiers—that may likely be the effect of the current proposal.

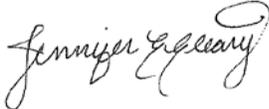
EPA's note on the energy efficiency requirements in the second draft proposed specification stated that EPA believes “that larger capacity units will meet the needs of smaller spaces while offering consumers more efficient and cost effective solutions. As a result, a single Energy Factor level continues to be proposed for all units rated less than 75 pints/day.” AHAM agrees that larger units may be able to meet the needs of smaller spaces. But EPA has recognized that larger units are more expensive, and is, thus overlooking the fact that consumers may not be able to purchase the larger unit and achieve the energy savings under the current proposal. Instead, many consumers may be forced to make a decision between a cost-effective solution (i.e., a smaller unit) and an ENERGY STAR rated product. This will mean that the energy savings EPA intends to achieve with this specification may be lost.

AHAM's conclusion is supported by the data attached at Attachment A which shows that it would take a consumer over seven years to recoup the extra cost for a larger ENERGY STAR unit. In other words, under the current proposal, where smaller units would not likely be able to qualify for ENERGY STAR, and a consumer would be forced to purchase a larger, more expensive unit in order to get an ENERGY STAR rated dehumidifier, it would take over seven years to recoup that extra cost through the energy savings. That is outside what we understand

ENERGY STAR's acceptable payback period to be and does not make sense for a product that has an average useful life of 10 years. Accordingly, EPA should re-instate at least some of the smaller product classes in order to remove the bias toward larger capacity units in the specification.

AHAM appreciates the opportunity to submit these comments on the ENERGY STAR Program Requirements Product Specification for Dehumidifiers, Eligibility Criteria, Draft Final, Version 3.0, and would be glad to further discuss these matters should you so request.

Best Regards,

A handwritten signature in black ink, appearing to read "Jennifer Cleary". The signature is written in a cursive style with a large, looping initial "J".

Jennifer Cleary
Director, Regulatory Affairs

ATTACHMENT A

Energy Star Usage (hours)
1095*

Capacity (pints/day)	DOE minimum (2012 std - Liters/kWh)	Energy Star minimum (2012 std. - Liters/kWh)	Efficiency in pints/kWh DOE	Efficiency in pints/kWh Estar	Usage based on home needing 30 ppd unit (days)	Pints Removed	Cost to operate at DOE min per year	Cost to operate at Estar per year	Savings/yr	Savings/yr on electric bill from purchasing 70ppd Estar Unit instead of 30 ppd DOE miniumum unit	Years to Recoup Additional Cost to Purchase Larger Unit Via Energy Savings (Based on an Estimated \$100 Price Difference)	Average Useful Life of a Dehumidifier (Years)
30	1.35	1.85	2.85	3.91	45.6	1368.75	51.09	37.28	13.81	13.81	7.24	10
70	1.7	1.85	3.59	3.91	19.6	1368.75	40.57	37.28	3.29			

*1095 active mode use hours per DOE's recent NOPR on standby/off mode measurement for dehumidifiers (75 Fed. Reg. 75290 (Dec. 2, 2010))