



NRDC Comments on EPA ENERGY STAR's Draft 2 Version 1.0 Specification for Residential Clothes Dryers

September 20, 2013

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's Draft 2 Version 1.0 Specification for Residential Clothes Dryers. NRDC strongly supports the development of an ENERGY STAR specification for residential clothes dryers and generally supports the proposed specification which would distinguish dryers that use approximately 20 percent less energy than standard efficiency dryers. NRDC offers the following specific comments on the proposed specification.

NRDC strongly supports the use of the new Appendix D2 test method for use in qualifying for the ENERGY STAR specification. Past research by Ecos for NRDC found that actual dryer energy use can vary significantly in real world conditions, in part due to variation in the effectiveness of automatic termination controls. This finding has been further validated by the Northwest Energy Efficiency Alliance's (NEEA) field research and by EPA's testing using the Appendix D2 test method. As EPA is aware, the Appendix D1 test method gives a blanket credit for automatic termination controls, whereas the Appendix D2 test method allows the dryer to run until the cycle completes, crediting dryers that use effective termination strategies. We think it is critical to test the effectiveness of these controls instead as this is a large potential area for energy savings. We therefore strongly support EPA's decision to use the Appendix D2 test method for use in qualifying for the ENERGY STAR specification.

NRDC agrees with the exclusion of combined washer dryers and water-cooled ventless dryers. NRDC agrees with EPA's proposal to exclude combined washer dryers and water-cooled ventless dryers from the proposed specification. These machines can use a significant amount of water and should not be included in ENERGY STAR at this time.

In the Draft 2 specification, EPA proposes to include non-water-cooled ventless dryers in the scope of coverage. Given that ventless dryers have the potential to use more energy than vented dryers, if EPA chooses to include them, we urge EPA to hold them to the same specification as vented dryers. While EPA proposes the same specification for standard size vented and ventless dryers, it proposes a much lower combined energy factor (CEF) for compact ventless dryers than for compact vented dryers, which we do not support. We recommend that EPA require the same CEF for compact ventless and vented dryers of 3.45 lbs/kWh.

NRDC recommends that EPA reconsider its decision to remove the drying time criteria. In the Draft 2 proposed specification, EPA proposes to remove the maximum drying time criteria and instead require that drying time simply be reported. While we agree with EPA's intention to not exclude certain technologies (e.g. heat pump dryers), we are concerned that without any limit at all this could lead to consumer dissatisfaction and a weakening of the ENERGY STAR brand. We suggest that EPA set a drying time limit that would allow heat pump dryers to qualify but also provide consumers with assurance that the dryer will dry the clothes in a reasonable amount of time. Based on the numbers presented in the draft specification, we propose that a limit of somewhere between 70 and 90 minutes would be appropriate. In addition to this limit, EPA should maintain the requirement that drying time be reported.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Meg Waltner", with a long horizontal flourish extending to the right.

Meg Waltner
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