



NRDC Comments on EPA ENERGY STAR's Version 1.0 Specification
Final Draft

April 16, 2014

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.4 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's Version 1.0 Final Draft Specification for Residential Clothes Dryers issued on March 26, 2014.

NRDC is very pleased to see EPA moving towards a final first-ever specification for residential clothes dryers. The ENERGY STAR label for dryers will be very valuable to consumers who want to reduce their dryer energy use, especially given that dryers are one of the largest remaining energy loads in the home. We generally support the proposed specification and offer the following comments:

NRDC continues to strongly support EPA's proposal to use the Appendix D2 test method. NRDC has commented on this issue extensively during the specification development process and continues to strongly support the use of the Appendix D2 test procedure for ENERGY STAR certification. We are pleased to see that EPA has chosen to require the use of Appendix D2 in the Final Draft specification. The Appendix D2 test method measures the effectiveness of automatic termination controls, which can have a significant effect on a dryer's energy use in the field. Use of the Appendix D2 test method is a critical foundation of the ENERGY STAR specification and we are pleased to see EPA requiring its use for certification.

NRDC continues to support the proposed drying time limit of 80 minutes. As discussed in previous comments, a drying time limit is necessary to avoid creating a loophole in the specification, whereby a manufacturer could simply increase drying time without limit to increase efficiency. This could result in unsatisfied consumers simply adjusting their dryer settings to achieve faster drying times, but negating field energy savings. An 80 minute drying time is reasonable given the available data. We recommend that EPA continue to evaluate this drying time limit as more data becomes available on consumer preferences and dryer performance.

NRDC is disappointed that EPA has chosen not to include a test and list requirement for the quickest dry cycle. NRDC had supported EPA's previous proposal to include a test and list requirement for the energy used by the fastest drying cycle. As discussed in detail in previous comments, energy efficiency and drying time are highly correlated and a manufacturer could include a "quick-dry" option that would dry clothes quickly but use more energy. We argue that consumers should have information on this energy use via a test and list requirement.

NRDC supports EPA's proposal to require that product materials include information on the energy use of various cycles. We support EPA's proposal to require that manufacturers include information in the product materials on the energy use implications of different cycles. We support EPA's proposal to require that these materials note which cycle and setting selections were used to achieve the ENERGY STAR rating. While we understand that setting configurations can vary model by model, we recommend that EPA require the information provided be inclusive of all setting configurations, rather than just identifying particular low and/or high energy modes. This information could be narrative as EPA suggests or could be a ranking of cycles from lowest to highest energy use (alternatively, cycles could be presented in energy use bins). We also recommend that the brochure include information on the time to complete the various cycles. This will allow a consumer to better understand the tradeoffs between dry time and energy use and to make informed cycle selection decisions.

NRDC supports EPA's proposal to allow early certification for products that are available before January 1, 2015. As indicated in previous comments, our understanding is that multiple manufacturers will have products available by the middle of this year that would meet the ENERGY STAR specification. Allowing these manufacturers to certify their products in 2014 once the specification is finalized will reward the investments they have made in energy efficiency while also providing important savings to consumers.

Thank you for the opportunity to submit these comments.

Sincerely,



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