

April 14, 2014

Amanda Stevens
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Final Draft of ENERGY STAR® Version 1.0 Specification for Clothes Dryers

Dear Ms. Stevens,

On behalf of the Super Efficient Dryer Initiative (SEDI), represented by the Collaborative Labeling and Appliance Standards Program (CLASP), Vermont Energy Investment Corporation (VEIC) and Grasteu Associates, we respectfully submit comments in regards to the 2014 ENERGY STAR® Emerging Technology Award Advanced Clothes Dryers Draft Criteria. SEDI is supported by the Northwest Energy Efficiency Alliance, the Northeast Energy Efficiency Partnerships and twelve individual North American energy efficiency programs and advocates:

BC Hydro
Connecticut Light & Power
Connecticut Natural Gas
Efficiency Vermont
PFEG Long Island
National Grid

New Jersey Clean Energy Program
Sacramento Municipal Utility District
Silicon Valley Power
Southern Connecticut Gas
United Illuminating
Florida Solar Energy Center

Thank you for the opportunity to submit these comments.

Sincerely,

My Ton
Christopher Wold
Collaborative Labeling and Appliance Standards Program (CLASP)

Rebecca Foster
Christopher Badger
Vermont Energy Investment Corporation (VEIC)

Christopher Granda
Grasteu Associates

SEDI Comments on the ENERGY STAR® Program Requirements Product Specification for Clothes Dryers: Eligibility Criteria Final Draft Version 1.0

ENERGY STAR® Clothes Dryer Market Strategy

SEDI supports ENERGY STAR's efforts to develop a specification that provides clear market signals to industry for the design and introduction of energy efficient clothes dryers. We anticipate that a strong ENERGY STAR specification will support the development of a robust market of qualified efficient clothes dryers with a range of different performance levels, technologies, and price points. In the Final Draft of the ENERGY STAR Version 1.0 Specification for Clothes Dryers, SEDI supports the EPA in striking an appropriate balance required of all ENERGY STAR products "to save energy without sacrificing features or functionality."

SEDI encourages the EPA to finalize the specification with the proposed amendments as soon as possible to allow for appropriate planning by manufacturers, retailers and efficiency programs to support a robust introduction of high efficiency ENERGY STAR clothes dryers in to the North American market prior to the January 1st, 2015 effective date.

As SEDI has previously commented on the previous Draft 2¹ and Supplemental Proposal² on the Version 1.0 ENERGY STAR Program Requirements for Clothes Dryers, the following comments reference the proposed amendments included in the EPA's Final Draft, as well as highlighting important elements for supporting the ENERGY STAR specification moving forward.

Referencing the Amended DOE Test Procedure Appendix D2

As commented previously, SEDI strongly "supports EPA's decision to use Appendix D2 of the DOE test procedure for the ENERGY STAR clothes dryer program. Laboratory testing conducted by DOE and Ecova on behalf of multiple SEDI sponsors demonstrates the energy savings potential of automatic termination; Appendix D2 captures this energy savings benefit. Measuring clothes dryer energy consumption using Appendix D2 will more effectively differentiate efficiency performance between clothes dryers and incentivize manufacturers to improve automatic termination technology." Absent the use of Appendix D2, SEDI and its sponsors would not be able to support the validation of energy savings to their regulators and in turn would not be able to support with financial rebates for ENERGY STAR dryers. That said, SEDI believes that additional improvements are needed to the D2 test procedure to better reflect consumer usage and "real world" conditions (e.g. more diverse test cloth mix).

Maximum Drying Time and Reporting Requirement

SEDI supports EPA's decision to include a maximum cycle time requirement to address concerns around consumer acceptance of significantly longer cycles times than are common with currently available dryers. Particularly if, as seems likely, many new, energy efficient dryers give

¹ [SEDI Comments on the Draft 2 Version 1.0 ENERGY STAR Program Requirements for Clothes Dryers submitted on September 13, 2013.](#)

² [SEDI Comments on the Supplemental Proposal for the Version 1.0 ENERGY STAR Program Requirements for Clothes Dryers submitted on January 23, 2014.](#)

users a choice of cycle times which are correlated with different levels of energy efficiency, the most efficient option should not take so long that few users will choose it. Our discussions with a few manufacturers that are planning to introduce high efficiency clothes dryers, including heat pump clothes dryers, suggest that the maximum cycle length requirement will not be an obstacle to North American market introduction. This was attributed to the manufacturer's own understanding of consumer preferences in designing products for this market and testing to Appendix D2 of the amended DOE test procedure. However, SEDI would encourage the EPA to review this maximum time requirement once additional efficiency, dry time and consumer preference data is received from qualifying products in 2015.

SEDI had previously voiced its support for the EPA's decision to require manufacturers to report the Combined Energy Factor (CEF) and drying time for both the required settings based on Appendix D2 and the fastest drying cycle, if different. SEDI remains concerned that new qualifying ENERGY STAR products may offer multiple settings, some of which may bypass the use of the new efficient technologies to provide customers with a "quick" or "fast dry" setting. With the removal of the reporting requirement for the "fastest cycle", SEDI would respectfully encourage the EPA to work with manufacturers and efficiency advocates to develop plans to evaluate how these new products are used in North American households to ensure that real energy savings are being realized.

SEDI supports the supplemental requirements that manufacturers provide specific guidance to consumers on the energy use of different settings and specifically the mode in which the dryer qualifies for ENERGY STAR. SEDI and its sponsors recognize the significant efforts required to increase consumer education around the energy use associated with the specific settings and usage of the dryer.

As commented previously, "SEDI proposes that EPA collaborate with clothes dryer manufacturers to establish requirements for a clothes dryer user interface that offers an unequal choice hierarchy that encourages user selection of the automatic termination option rather than timed cycles. ENERGY STAR could further enhance this user interface requirement by requiring manufacturers to clearly identify the automatically terminated cycle option as the primary or preferred efficient option through labeling, placement on the control panel, and language in the product manual."

Product Definitions

SEDI supported EPA's previous decision to expand the definitions of clothes dryers to cover full-size ventless electric clothes dryers and 120V ventless electric compact dryers. The new and expanded definitions for electric and gas dryers will allow new high efficiency products to qualify for the ENERGY STAR program and provide a broader range of choice for the end consumer.

However, based on prior research of European heat pump dryers, SEDI found that some heat pump dryers that are defined as "compact" because of their dimensions are actually rated to dry a larger volume of clothing than a typical North American "standard" sized dryer. Furthermore, prior testing has shown that compact heat pump dryers demonstrate greater energy efficiency when drying a larger, "standard" sized load than they do when drying the "compact" sized load defined in the test procedure. The definition of a "compact" clothes dryer in the DOE test procedure should be recognized as an artifact of past products and an earlier market which, if not handled properly, could now create a barrier to innovation. SEDI would respectfully

encourage the EPA to work with the DOE and dryer manufacturers to review the defined categories for clothes dryers, as well as the performance metrics that define them.

Achieving Benefits Through “Connected” Functionality

As commented previously, “SEDI agrees that maintaining openness, function, and communication technology neutrality toward “Connected” functionality in the ENERGY STAR clothes dryer requirements will allow EPA to avoid conflicts with the many interested parties working on integration of home appliances into a future, more intelligent grid.

We support EPA’s plans to work with DOE to develop a test procedure for “Connected” functionality. We also believe that any performance credit awarded for “Connected” functionality should be proportional to the energy efficiency benefit provided by that functionality to the individual customer or utility, and not provide a mechanism for manufacturers obtain ENERGY STAR qualification for clothes dryers that do not actually provide significant energy savings in typical use. Further, as initial improvements to conventional dryers seeking to meet the ENERGY STAR specification may include lengthening the drying time and reducing the heater power levels, it is important to not double count energy savings from any demand response functionality.”