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United States Environmental Protection Agency  
Office of Air and Radiation  
Washington DC, 20460

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Ms. Stevens,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the Supplemental Proposal for the ENERGY STAR Clothes Dryers Draft 2 version 1.0 Specification. After a careful review of the proposed specification, NEEP submits the following comments into consideration.

Generally, NEEP is supportive of the core elements of the supplemental proposal. We support setting a dry-time limit, using the D2 test method, and we additionally support the “test and report” requirement for manufacturers to report their dryer’s cycle time and energy consumption of their fastest dryer setting. We feel that an 80 minute dry-time is an acceptable limit for the purposes of this specification. We also feel that requiring the D2 test method is a crucial component of the specification and stand by ENERGY STAR’s decision to require D2. We feel that the “test and report” information will provide helpful data to inform the next version of the ENERGY STAR Specification without providing an undue burden on clothes dryer manufactures.

While there is a need within the efficient dryer community for a deeper understanding of consumer preference to determine appropriate dry-time limits, that analysis is not yet available; we feel that the proposed limit seems a reasonable level for now but encourage EPA to revisit the levels with future iterations of this specification. Additionally, while the D2 test method is a step in the right direction, the efficient dryer community prioritizes developing a test procedure with more real-world inputs. At this point, however, we feel the specification should stand as is and an improved test method could be integrated into future iterations of this specification. We feel that this specification should be finalized and go into effect as soon as possible to maximize the energy savings opportunity in this product category.

Finally, we would request that the EPA consider advocating that the DOE include D2 testing as part of their verification/compliance testing of clothes dryers once the new federal standards are in effect (1/1/2015). This would not only help to inform the DOE’s future test procedure and standard setting process, but would also help define a better clothes dryers baseline for both the EPA and efficiency programs.

Thank you again for offering this opportunity to provide comments on this proposed category expansion. Please don’t hesitate to contact me with any follow up questions or clarifications.

Sincerely,

Claire Miziolek  
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