



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

January 24, 2014

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 Supplemental Notice for Residential Clothes Dryers issued on December 19, 2013.

NRDC continues to strongly support the development of an ENERGY STAR specification for residential clothes dryers and in general supports the proposals made in the December 19th Supplemental Notice. NRDC offers the following specific comments on the issues identified in the Supplemental Notice:

NRDC strongly supports EPA's proposal to use the Appendix D2 test method. As NRDC has discussed in previous comments, the D2 test method measures the effectiveness of automatic termination controls, rather than the simple credit given under the Appendix D1 test method. Research by Ecova and the Northwest Energy Efficiency Alliance (NEEA) shows that actual energy use of dryers varies significantly in the field. This is in part caused by the variation in the effectiveness of automatic termination control strategies. Several technology options exist to improve the effectiveness of termination controls (such as integrating sensors into the rotating part of the drum or including multiple sensors), which could lead to significant savings in dryers. These savings will only be captured under the Appendix D2 test procedure. Furthermore, testing under the Appendix D2 test procedure will provide better information to consumers about the level of efficiency a dryer is likely to achieve in the field.

NRDC supports the proposed drying time limit of 80 minutes. In our previous comments, NRDC encouraged EPA to include a drying time limit that was long enough to allow heat pump dryers to qualify but short enough to ensure consumer satisfaction. Including a drying time limit is important for two main reasons. First, some heat pump dryers can take on the order of two hours to dry clothes, which may not be acceptable to consumers and risks damaging the ENERGY STAR brand. Second, Ecova testing has shown that efficiency and drying time are correlated and so some manufacturers may simply increase the drying time of an existing model to meet the ENERGY STAR specification. Without a limit on drying time, this could create a major loophole. The available data supports that EPA's choice of an 80 minute limit for drying time is reasonable. This time limit would allow for some heat pump models to qualify, but still be within the range of drying times for non-heat pump models. We recommend that EPA continue to evaluate this issue going forward and to adjust the drying time limitation as necessary as there is additional information on consumer preferences and dryer performance.

NRDC supports the test and list requirement for energy used during the quickest dry cycle. As discussed in the previous section, efficiency is highly correlated to dry time, in that energy efficiency can be increased for a given dryer by reducing the power to or cycling the heating element while increasing the run time of the dryer. This means that a manufacturer could simply slow down the dryer under the default mode to meet the ENERGY STAR specification and include a “quick dry mode” that provides the same energy and time performance as today. This scenario would be unlikely to achieve field energy savings. As discussed in the following paragraph, EPA should set a specification high enough that it cannot be reached by increasing dry time alone. EPA should also include a test and list requirement for the fastest mode to provide consumers with better information on their dryer’s energy usage. Reporting this information to EPA will also inform future specification revisions. The manufactured defined fastest cycle should be capable of drying the DOE test load to 2 percent RMC.

In addition to supporting the test and list requirement, we also support the comments by the CA Investor Owned Utilities (IOUs) that EPA should require manufacturers to clearly and consistently label the mode used to qualify for ENERGY STAR (and/or the lowest energy mode). This will provide information and flexibility to consumers who may value different performance characteristics, such as speed or low energy use, at different times, and allow them to make a conscious decision for how to operate their dryer.

NRDC supports the comments made by the California IOUs that EPA should consider a higher specification. As outlined in the comments submitted by the California IOUs, there are a range of technology options that can be used to improve the efficiency of dryers and this potential is not fully captured by the proposed specification. We support the proposal by the IOUs to either implement a sloped specification based on dry time or increasing the specification to a CEF of 4.29.

NRDC encourages EPA to consider an earlier effective date than January 1, 2015. Our understanding is that multiple manufacturers will have products available by the middle of this year that would meet the ENERGY STAR specification. Delaying the specification date could negatively impact these manufacturers who have invested in improving their product lines. Furthermore, delaying the effective date will deny consumers information on dryer efficiency (in particular since there is no Energy Guide label), even though there are more efficient products on the market. Therefore we encourage EPA to consider amending the effective date to mid-2014.

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
Manager, Building Energy Policy