



NRDC Comments on EPA ENERGY STAR's Draft 1 Version 1.0 Specification for Residential Clothes Dryers

October 5, 2012

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 1 Version 1.0 Specification for Residential Clothes Dryers. NRDC strongly supports the development of an ENERGY STAR specification for residential clothes dryers.

In 2010, NRDC commissioned Ecos Consulting to study opportunities for energy efficiency improvement in residential dryers (attached as Appendix A). Ecos found that dryers are the single largest residential energy use for which there are no voluntary or mandatory labeling programs in the US, despite technology options, such as heat pump dryers, that can cut energy use by 30 to 50 percent. The fact that there is little distinction between dryers in the US is largely due to issues with the test procedure, which does not adequately capture variation in energy efficiency. Ecos' testing found that actual drying energy for conventional electric dryers could vary by 20 to 30 percent for the same load, but that this difference was not being measured under the current test procedure. In particular, Ecos found that the current test procedure was not capturing energy used during the final, high-heat stage of the drying cycle because the test stops at 5 percent remaining moisture content, and therefore does not test the effectiveness of termination control strategies. Given the findings of the Ecos report, NRDC offers the following comments on the proposed ENERGY STAR specification.

NRDC recommends that EPA work in conjunction with DOE to develop a test method that captures the effectiveness of automatic termination controls. EPA should not give an across the board credit for the existence of automatic termination controls without testing their effectiveness. NRDC disagrees with EPA's proposal to give a blanket credit to dryers that include automatic termination controls as these controls can vary in effectiveness, including resulting in over drying. NRDC submitted a petition jointly with other advocates and manufacturers to DOE on September 8 2011 in response to DOE's Request for Information on Test Procedures for Residential Clothes Dryers urging DOE to revise the test procedure to capture the effectiveness of automatic termination controls. NRDC urges EPA to work with DOE to modify the test procedure as recommended in the 2011 petition.

NRDC agrees with the exclusion of combined washer dryers and water-cooled ventless dryers. NRDC recommends that DOE also exclude ventless dryers at this time. NRDC agrees with EPA's proposal to exclude combined washer dryers and water-cooled ventless dryers from the proposed specification. These machines can use significantly

more water than a separate washer and dryer and should not be included in ENERGY STAR at this time. NRDC also recommends that EPA exclude ventless dryers at this time, since this product category is inherently less efficient and could be misleading to consumers.

NRDC supports the inclusion of the five percent energy allowance for clothes dryers with connected capabilities. NRDC supports the inclusion of a temporary five percent energy allowance for clothes dryers that meet connected criteria and awaits EPA's development of a test procedure for connected features. When incorporating connected features into the ENERGY STAR specification, EPA should ensure that any additional energy use (standby or otherwise) added by these features is captured in the test procedure and reflected in the specification.

NRDC agrees with EPA's proposal to include a maximum drying time requirement, but recommends increasing the limit to 60 minutes so as not to exclude existing heat pump dryers from qualifying. While NRDC agrees that it is important to include a maximum drying time to preserve consumer utility, EPA's proposal of 50 minutes could exclude heat pump technologies. EPA should consider revising the maximum drying time requirement so that dryers using heat pump technologies can still qualify.

NRDC disagrees with the proposal to limit timed drying to a maximum of 15 minutes per cycle. As noted above, automatic termination controls vary in effectiveness, and this variation is not captured by the current test procedure. In some cases this may result over drying and in other cases under drying, leading some consumers to use the timed dry option instead. Limiting the timed dry option to only 15 minutes could lead to consumer frustration and dissatisfaction as this amount of time is unlikely to be sufficient to dry a load. Additionally, 15 minutes is not long enough for a heat pump dryer cycle and would lead to inefficient operation. While NRDC is not opposed to a maximum timed drying setting generally, it should be an amount of time that is long enough for a heat pump cycle and which is likely to dry a load of clothes.

Thank you for the opportunity to submit these comments.

Sincerely,



Meg Waltner
Energy Efficiency Advocate