

NOVELAIRE TECHNOLOGIES

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December 16, 2010

Dear Ms. Daken,

In your email of November 24, 2010, you requested Dehumidifier Stakeholders to present data for non Energy Star qualified models so that the Agency could propose efficiency requirements for products currently on the market. I would like to take the opportunity point out some fundamental flaws in the current specification:

- 1) The current specification provides for electrical energy consumption only, and fails to correct for enthalpy change. The typical DX system operation raises temperature in the building space requiring non-measured supplemental energy to optimize the space within the ASHRAE Comfort Zone; such additional energy consumption is ignored by the present Energy Star measurement requirements.
- 2) The current specification provides for electrical energy consumption only, which fails to inform the consumer of more energy efficient and environmentally friendly dehumidifiers. NovelAire Technologies and others manufacture a variety of dehumidifiers including dehumidifiers using desiccant wheels regenerated:
 - a) using hot water from solar or waste heat sources;
 - b) using natural gas or propane which in some situations may provide a more environmentally friendly and efficient performance; and
 - c) using waste heat directly – such as from a refrigerant system condensing coil.

I refer you to our website (www.novelaire.com) and our models ComfortDry 250, ComfortPlus 300 and ComfortDry 400.

NovelAire would be pleased to work with the EPA to expand the Energy Star dehumidifier program beyond electrical energy. Please do not hesitate to call on me.

Thank you.

Sincerely,



Neil A. Stephansson
President