

January 23, 2013

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

RE: ENERGY STAR® Clothes Dryers Draft 2 Version 1.0 Specification - Supplemental Proposal

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 Supplemental Proposal for the ENERGY STAR® Program Requirements Product Specification for Clothes Dryers: Eligibility Criteria Draft 2 Version 1.0. SEDI is supported by the Northwest Energy Efficiency Alliance, the Northeast Energy Efficiency Partnerships and fourteen 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 Supplemental Proposal for the ENERGY STAR® Program Requirements Product Specification for Clothes Dryers: Eligibility Criteria Draft 2 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 proposed amendments to the Draft 2 Version 1.0 ENERGY STAR Program Requirements 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 for the January 1st, 2015 effective date. In addition, we would support early certification of clothes dryers prior to the January 1st, 2015 implementation date. This would help to support the early market entry of high efficiency clothes dryers in 2014.

As SEDI has previously commented¹ on the Draft 2 Version 1.0 ENERGY STAR Program Requirements for Clothes Dryers, the following comments are focused on the proposed amendments included in the EPA's Supplemental Proposal.

Maximum Drying Time and Reporting Requirement

SEDI does not oppose EPA's decision to reintroduce the maximum dryer time requirement to address concerns around consumer acceptance of excessively long dry times and likely shift towards the usage of faster, less efficient dryer settings. SEDI discussions with a few manufacturers with plans to introduce high efficiency clothes dryers, including heat pump clothes dryers, did not consider the time requirement to be an obstacle to North American market introduction of their products. 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 supports 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. This will allow EPA to track the drying time of new products entering the North American market and to inform future revisions to the ENERGY STAR clothes dryer specification. In addition, SEDI would encourage the EPA to request reporting the CEF and drying time in the most efficient dryer setting. EPA has made a similar request in the 2013 ETA

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

requirements.

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.”

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.