Draft 1 Version 2.0 Water Cooler Specification
Comment Response Document

No.	Comment	Response
1	Bottom loading WCs should be addressed separately in the specification. During standby, it is always on and requires 32 watts additional energy. Suggest increasing Cold and Cook Bottom Loading limit to 0.192 kWh/day.	EPA is in favor of creating a separate Bottom Loading Water Cooler subcategory under the Cold Only and Cook and Cold category and would like to analyze data to determine the inherent drivers for higher consumption in these product types. Manufacturers are encouraged to comment on this proposal and provide feedback on the definition provided in Section 1.
2	The proposed 0.81 kWh/day is an aggressive reduction from 1.2 and rating should be based on hot and cold water output per hour. Otherwise, there will be models claiming to comply with ENERGY STAR but fail to deliver i.e., reduction in outputs should be reflected in energy use.	EPA requests additional information on the relationship between flow rate and No Water Draw energy consumption.
3	Since hot water is not drawn at all in Hot and Cold - On Demand units the heater is not engaged and limit should be the same as Cold and Cook i.e., 0.16 instead of 0.18 kWh/day.	EPA has limited data on these product types but will consider this proposal if data provided justifies the change. EPA encourages stakeholders to provide data and information that supports or challenges this suggestion.
4	Add POU specifically to Table 1: Energy Efficiency Criteria or add a note clarifying that POU, dry storage compartment, and bottled water coolers are included.	EPA appreciates the stakeholder comment and has added a note to Table 1: Energy-Efficiency Criteria for ENERGY STAR Qualified Water Cooler.
5	To clarify compartment definitions, refer to storage as "dry storage compartment" and cooling as "refrigerated compartment".	
6	Water coolers with refrigerated compartments should be rated in accordance with hot and cold water outputs and size of cold storage. Our true refrigerated unit allows for non-melting of ice and has 22 liter cold storage volume, and uses 1.5 kWh/day.	EPA anticipates that market share for this product type is small at this time and therefore, does not plan to accommodate this feature in the Version 2.0 specification. EPA is amenable to further feedback from stakeholders on the need for an accommodation.

7	EPA should confirm that all water cooler models currently listed as ENERGY STAR have been third party certified and if not, these models should be removed from the dataset and the analysis revisited.	To address these concerns, EPA updated its dataset to only include hot/cold models that have been third party certified as ENERGY STAR and found that the levels proposed in the Draft 1 specification continue to recognize multiple manufacturers and approximately 25% of this dataset, which is reasonably reflective of the current Water Cooler market. EPA also notes that numerous additional units that are expected to be certified in 2013 in anticipation of the Version 2.0 effective date meet the level proposed in Draft 2.
8	There is significant concern that offering a credit for energy saving devices may not accurately reflect the power consumption once such units are put into service. EPA should not implement a standby credit for qualifying water coolers for On Mode with No Water Draw that include a shut down feature that is enabled when shipped.	EPA continues to be in support of energy saving devices but without documented energy savings associated with such features, providing an allowance is problematic. EPA encourages stakeholders to provide documented energy savings associated with the energy saving features of their water coolers to show a clear value in their usage. To date, EPA has not received any data from stakeholders and will not be able to support an allowance without this data.
9	Any additional model changes based on cabinet design, color or other exterior features that do not affect the basic energy consumption of the water cooler should not require additional testing.	EPA has added a product family definition to Section 1 of the specification that allows the testing of a representative model, and requests comment.
10	EPA should take changes in refrigeration use and other changing technologies into account when developing new criteria.	EPA has not received any data or information to date on the potential impacts of new technologies. EPA requests stakeholders to provide data and other information for consideration when deciding whether adjustments to the levels are appropriate.
11	To meet the new levels, water coolers may need to be more complex and use more costly components. This may reduce the number of water coolers available forcing distributors to purchase non-ENERGY STAR qualified models.	EPA believes that the proposed level is cost effective but requests additional data, particularly with regards to commercial models, on any increase in pricing or cost to manufacturer.

12	EPA should consider sales volumes when choosing a level for storage type water coolers to better understand overall impact on market.	Sales information at this granular level is not readily available. Furthermore, typically EPA does not choose levels based on sales weighted data. Especially in markets with high market penetration, the hope is that by setting the level such that only the top performers can meet EPA is encouraging greater uptake of these more efficient models and longer term, increased sales even if today sales are a small percentage of the marketplace.
13	There is concern that in California, where all water coolers purchased after 12/31/05 must meet current ENERGY STAR levels, a used water cooler market could emerge if there is limited availability of new ENERGY STAR qualified models or if those that qualify are unable to meet the needs of the home and office delivery segment. This could spread to other parts of the country and actually result in greater energy consumption nationwide. EPA must consider state requirements when determining levels.	EPA believes, based on the ENERGY STAR dataset, that with the proposed levels, a sufficient selection (e.g., size, brand, type) of products from multiple manufacturers will be eligible for ENERGY STAR certification.
14	There is concern that the new standby levels will be adopted by DOE given efforts to address water coolers in legislation, and voluntary will soon be mandatory. EPA should take this into account when choosing levels.	The guiding principles of the ENERGY STAR program call on EPA to establish ENERGY STAR levels that recognize the top performers in the market. Minimum efficiency standards, in contrast, create a floor. As such, a level set now for use by the ENERGY STAR program, is not appropriate for current minimum standards.

15	As expressed in earlier comments to EPA, industry stakeholders remain concerned with certain provisions within the earlier draft versions of the test method that are now included in the Final ENERGY STAR Water Cooler Test Method and therefore might ultimately be required within the final Version 2.0 specification. In particular, we remain firm in our belief that only the No Water Draw test method should be required and the Water Draw test method should be comprehensively studied further and not used for purposes of certification.	To date, EPA has received very limited data representing the energy consumed while in On Mode with Water Draw and no information has been submitted by manufacturers or distributors with regards to actual associated testing costs. Based on this and the need for industry stakeholders to become more familiar with the test method, EPA has removed the placeholder for an On Mode Power (OMP) level within the Draft 2 specification. The On Mode with Water Draw test remains in the ENERGY STAR Test Method in its entirety to allow stakeholder more time to review and apply the procedure. To qualify for Version 2.0, water coolers will only need to meet minimum On Mode with No Water Draw requirements.