



November 11, 2011

To: Amanda Stevens
Energy Star Appliance Program
Environmental Protection Agency

From: Edward Osann and Meg Waltner
Natural Resources defense Council

Re: Comments on Draft 1: Version 6.0 Energy Star Clothes Washer Specification

Summary

NRDC objects to the adoption of Draft 1 Version 6.0 specification as it pertains to combination all-in-one washer-dryers (combination W/Ds). We recommend that ENERGY STAR separate the proposals for combination W/Ds from the pending revisions for commercial clothes washers. This will allow additional time to consider the unresolved issues presented by combination W/Ds without delaying the larger savings from the commercial clothes washer specification.

Specification for combination W/Ds should not use flawed DOE dryer test procedure.

NRDC has concerns with the current Department of Energy test procedure for clothes dryers, which does not account for the effectiveness of automatic termination controls. In 2010, NRDC commissioned Ecos Consulting to study opportunities for energy efficiency improvements in dryers (report attached as Appendix A). The Ecos report found that the current DOE test procedure was missing potential energy savings by not testing the effectiveness of automatic termination controls. The current DOE test procedure ends the test when the test cloths have reached 5% remaining moisture content (RMC), rather than allowing the dryer to run until the end of cycle. This assumes that all dryers have equally effective end-cycle controls strategies, which Ecos found vary significantly in practice. According to Ecos, a *Consumer Reports* study found that electronically controlled dryers could shut down 5 to 15 minutes after detecting clothes were dry, while electromechanically controlled dryers needed up to 50 minutes before shutting down.¹

¹ ESOURCE, 2001, p. 143.

NRDC, the Appliance Standards Awareness Project (ASAP), the Association of Home Appliance Manufacturers (AHAM) and other efficiency advocates have been working over the last year and half to correct this flaw in the test procedure. NRDC submitted comments to DOE with these and other recommendations in April 2010. Additionally, NRDC submitted a joint petition AHAM, ASAP, and other advocates in August 2010 urging DOE to modify the test procedure to test the full cycle, including cool-down. DOE initially indicated that it would modify the test procedure to run until the end of cycle in the June 2010 SNO PR. However, DOE did not modify the test procedure to run to the end of cycle in the final rule, due to limited testing which found that running dryers to the end of cycle with the DOE test load resulted in a bone dry load. DOE was concerned that this would result in dryers with automatic termination controls appearing less efficient than those without automatic termination.

In response to DOE's concerns, AHAM conducted additional testing on the effect of running the test until the end of cycle. They tested dryers that make up approximately 60 percent of their shipments and found that with the DOE test cloths all dryers ended between 0 and 2 percent RMC when run until the end of cycle with the "normal" program selected. Based on these tests, NRDC and AHAM jointly petitioned DOE in September 2011 to modify the test procedure to run the test until end of cycle, with specific recommendations based on the AHAM testing (attached as Appendix B). DOE published this petition in the Federal Register on October 11 with request for comments by December 12. (76 Fed. Reg. 62644, October 11, 2011)

Due to these unresolved issues with the DOE test procedures, NRDC recommends that ENERGY STAR defer consideration of the combination W/D specification to allow DOE additional time to modify the dryer test procedure.

Specification for combination W/Ds fails to account for a significant portion of water use.

There is a major risk that consumers will be misled about the water efficiency of combination W/Ds due to the failure of the proposed specification to incorporate water used during dryer mode operation of unvented units. To the extent that additional data need to be collected, we believe this should be done before any Energy Star specification is adopted for combination W/Ds, rather than after the fact.

attachments