

April 7, 2005

Ms. Mehernaz Polad
ICF Consulting
US Environmental Protection Agency
mpolad@icfconsulting.com

Dear Ms. Polad:

Re: Position of Natural Resources Canada on Energy Star Dehumidifiers Criteria for 2006

Natural Resources Canada would like to thank you for the opportunity to comment on the new proposed changes in dehumidifiers criteria for 2006.

The *Office of Energy Efficiency of Natural Resources Canada* agrees that the Energy Star qualifying criteria should be changed for the *Energy Star* qualified dehumidifiers due to the quick growing market for products within the 10-35L/day category. These changes should be feasible for industry and customers to achieve good market penetration and good savings in terms of energy consumption.

The Canadian marketplace and consumers provide a major market niche for the US manufacturers and suppliers of dehumidifiers. Consequently, any substantial changes to the qualifying criteria for *Energy Star* products would have a significant impact on the Canadian consumers, the US manufacturers and suppliers as well as their Canadian competitors. Any considered changes to these criteria should take into account the consumer choice and preference, financial impact on the industry and government policy.

In our opinion, the proposed six dehumidifiers capacity bins will better differentiate the products that are presently on the market. However, it should be noted that the energy factor (EF) proposed for some of the dehumidifiers capacity bins would exclude a large number of presently qualified models and will impose restrictions on the new models introduced to the market.

Table 1 summarizes the information on *Energy Star* products that are available in the Canadian database as of March 8, 2005:

Table 1 - Canadian Database*

<i>Capacity Bins</i>	<i>Number of Qualified Products</i>	<i>%Total</i>
Total Products	184	
Energy Star Products	138	75.0
<i>Less than 10 L/day (EF > 1.2 L/kWh)</i>	4	2.17
<i>10-25 L/day (EF > 1.3 L/kWh)</i>	109	59.24
<i>25-35 L/day (EF > 1.5 L/kWh)</i>	25	13.59
<i>36-57 L/day (2.25 L/kWh)</i>	0	0

*As of March 8, 2005

Table 2 illustrates the impact of the proposed new criteria (provided on March 7, 2005) on the qualified Energy Star products available in the Canadian database. This table shows a significant drop in the number of qualified Energy Star dehumidifiers in the Canadian market (approximately 73%). It should also be noted that the proposed new criteria will, to a large extent eliminate the currently qualified models within the 30-40 pints/day capacity.

Table 2 - Energy Star Qualified Products

<i>Capacity Bins</i>	<i>Number of Qualified Products</i>	<i>% Total</i>
<i>less than 25 pints/day (EF>1.2L/kWh)</i>	6	3.26
<i>25-35 pints/day (EF>1.4L/kWh)</i>	2	1.09
<i>25-45 pints/day (EF>1.5L/kWh)</i>	12	6.52
<i>45-54 pints/day (EF>1.6L/kWh)</i>	24	13.04
<i>54-75 pints/day (EF>1.8L/kWh)</i>	6	3.26
<i>75-120.5 pints/day (EF>2.25L/kWh)</i>	0	0
Total	50	27.17

**As of March 8, 2005*

Table 2 also shows that the number of qualified Energy Star products in Canadian market will decrease substantially from 75% to 27% (change from 138 qualified items to 50).

For comparison, Figure 1 and Figure 2 show a distribution of dehumidifiers product available in the Canadian database for EnerGuide and Energy Star qualified products based on their capacity and EF.

Based on the information provided as well as the information available in the Canadian database, we suggest that the new proposed criteria for EF be revised for second and third capacity bins to $EF > 1.3$ and $EF > 1.4$ respectively. Table 3 presents the proposed revised EF levels:

Table 3 - Proposed New Energy Star Criteria

<i>Capacity Bins</i>	<i>Number of Qualified Products</i>	<i>% of Total</i>	<i>Average EF (L/kWh)</i>
<i>less than 25 pints/day (EF>1.2L/kWh)</i>	6	3.26	1.24
<i>25-35 pints/day (EF>1.3L/kWh)</i>	8	4.35	1.33
<i>25-45 pints/day (EF>1.4L/kWh)</i>	20	10.87	1.35**
<i>45-54 pints/day (EF>1.6L/kWh)</i>	24	13.04	1.51
<i>54-75 pints/day (EF>1.8L/kWh)</i>	6	3.26	1.68
<i>75-120.5 pints/day (EF>2.25L/kWh)</i>	0	0	0
Total	64	34.78	-

**As of March 8, 2005*

*** Excluding five 40.15 pints/day units with EF between 2.36 - 6.36 (Goldstar and LG products)*

New values, presented in Table 3, are based on the average EF of 1.3 and 1.4 for second and third capacity bins (as per Canadian database). The revised new criteria will allow:

- more products to be qualified (*64 rather than 50; Table 2*), and
- good range of product capacity (*Table 2*) within units range of 25-45pints/day capacity.

In the end, we would like to raise the question on how the desiccant dehumidifiers technology will fit into this category. Are there any future plans for this technology to be considered and regulated?

Thank you for your consideration of our comments.

Best Regards,

Renata Mortazavi, M.A.Sc.

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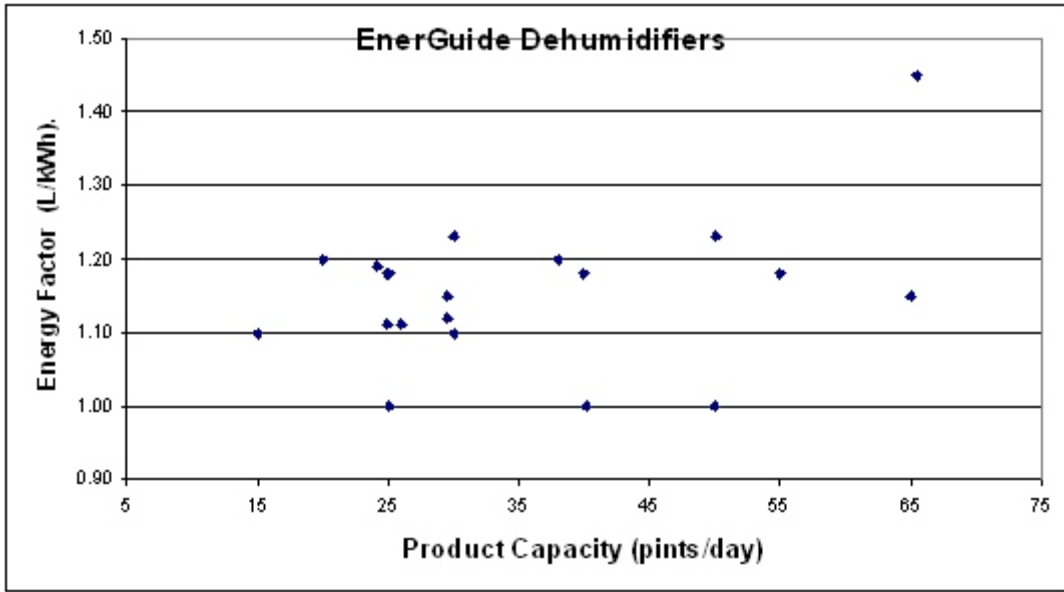


Figure 1 - EnerGuide qualified dehumidifiers

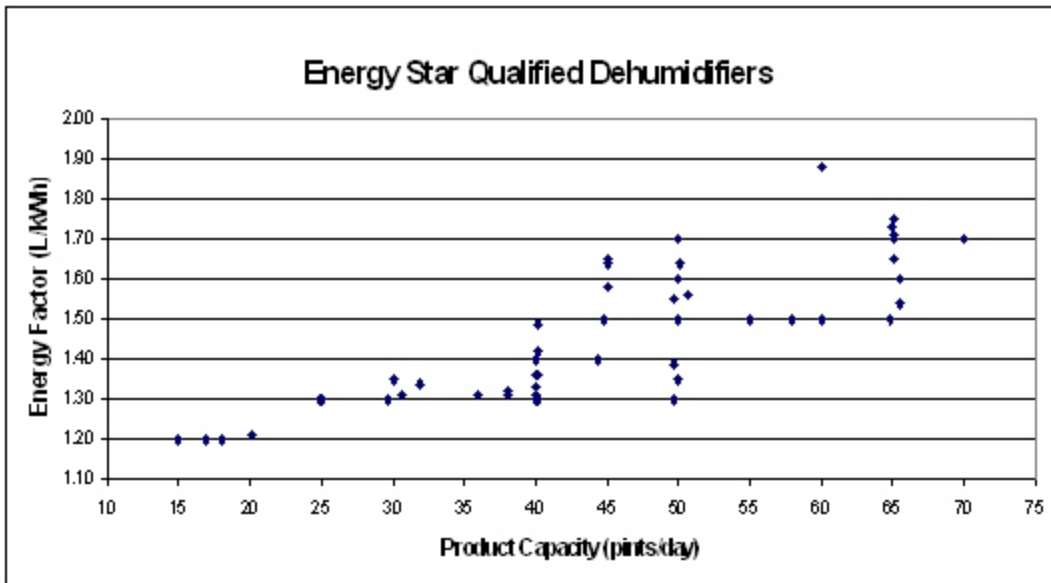


Figure 2 - Energy Star qualified dehumidifiers