

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
National Consumer Law Center
Natural Resources Defense Council

December 14, 2023

Steve Leybourn
Product Manager ENERGY STAR Appliances
U.S. Environmental Protection Agency

RE: ENERGY STAR® Clothes Dryer Version 2.0 Specification Discussion Guide

Dear Mr. Leybourn:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), National Consumer Law Center (NCLC) on behalf of its low-income clients, and the Natural Resources Defense Council (NRDC) on the ENERGY STAR clothes dryer version 2.0 specification discussion guide published on November 9, 2023.¹ We appreciate the opportunity to comment.

The ENERGY STAR specification for residential clothes dryers (v1.1) was last updated in 2015, and as of 2022, 46% and 56% of shipments of electric and gas dryers, respectively, are ENERGY STAR certified. Furthermore, as EPA notes in the discussion guide, the clothes dryer market has evolved significantly with highly-efficient heat pump dryers entering the market. Heat pump dryers are a growing market segment that are expected to deliver significant energy savings versus conventional electric resistance dryers, including current ENERGY STAR-certified models.² Thus, there is a clear need for ENERGY STAR to update the clothes dryer specification to better reflect the most efficient dryers on the market. We appreciate EPA's efforts to engage with stakeholders through the release of the clothes dryer specification discussion guide.

We support incorporation of commercial clothes dryers into the ENERGY STAR program. Commercial clothes dryers have been identified previously by both DOE³ and the California Energy Commission (CEC)⁴ as a meaningful energy savings opportunity; however, there is currently no DOE test procedure for commercial dryers. Commercial clothes dryers are broadly segmented into single-load dryers used in laundromats or multi-family housing and larger multi-load dryers used in laundromats and commercial

¹ENERGY STAR Clothes Dryer Version 2.0 Discussion Guide, November 2023.

www.energystar.gov/products/clothes_dryers/clothes_dryer_products_website_version_2_0#msdyntrid=cd921q8C3yqFHti8IFkGGrqEo_BITo8fGgvomjCWOgw

²DOE's recent analysis for the clothes dryers proposed showed that the efficiency of standard-sized electric heat pump (CEF = 7.39) and hybrid heat pump (CEF = 5.20) dryers was about 90% and 30% greater, respectively, than the current ENERGY STAR level (CEF = 3.93). Table IV.16. 88 Fed. Reg. 51734, 51757 (August 23, 2022).

³W. Goetzler et al. Energy Savings Potential and RD&D Opportunities for Commercial Building Appliances, 2016. www.energy.gov/sites/prod/files/2016/06/f32/DOE-BTO%20Comm%20Appl%20Report%20-%20Full%20Report_0.pdf

⁴Commercial Clothes Dryers CASE Initiative For PY 2013: Title 20 Standards Development. efiling.energy.ca.gov/GetDocument.aspx?tn=71757

on-premise laundry (OPL) facilities. Single-load dryers are often referred to as “residential-style” dryers since they are intended to be used by individual consumers and are similar in construction to residential dryers.⁵ We understand that single-load commercial dryers could generally be tested under Appendix D2 with minor modifications. Testing of large multi-load dryers, which can handle up to several hundred lbs. of laundry, likely require additional considerations. However, these large, typically gas-fired dryers represent a larger energy savings opportunity according to the referenced DOE report. Thus, we encourage EPA to continue soliciting stakeholder feedback on how to best test all types of commercial clothes dryers.

We encourage ENERGY STAR to attempt to ensure that ENERGY STAR-certified dryers are efficient over a range of cycle settings. EPA notes in the discussion guide that some users may switch out of the normal cycle (i.e., the cycle used to achieve ENERGY STAR certification) to use a more energy intensive one if the normal cycle does not meet customer expectations of load dryness, for example.⁶ Given the current lack of data on consumer behavior (i.e., how often consumers select non-default cycles), it seems prudent for ENERGY STAR to consider requiring testing of additional cycle settings to ensure ENERGY STAR clothes dryers are efficient across a range of test conditions. For example, as part of the ENERGY STAR Most Efficient criteria,⁷ EPA requires that dryers with independently selectable drying temperatures be tested at the maximum temperature setting, where they must meet the current ENERGY STAR level. At a minimum, we encourage EPA to set a similar requirement as part of the updated clothes dryer v2.0 specification.

Thank you for considering these comments.

Sincerely,



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⁵Single load commercial dryers are typically more durable than residential units and are often outfitted with additional hardware for card or coin payment operations.

⁶p. 7, ENERGY STAR Clothes Dryers Version 2.0 Specification Discussion Guide.

⁷www.energystar.gov/sites/default/files/Clothes%20Dryer%20ENERGY%20STAR%20Most%20Efficient%202022%20Criteria.pdf