

Appliance Standards Awareness Project
Natural Resources Defense Council

September 7, 2018

Abigail Daken
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Draft 1 Version 5.0 Specification for Dehumidifiers

Dear Ms. Daken,

The enclosed are the comments of the Appliance Standards Awareness Project (ASAP) and the Natural Resources Defense Council (NRDC) in response to the Draft 1 Version 5.0 ENERGY STAR Dehumidifiers Specification released on August 8, 2018. We appreciate the opportunity to comment.

We support the proposed Integrated Energy Factor (IEF) requirements for Version 5.0.

We agree with EPA that the time is ripe to update the dehumidifiers specification given the very high current market penetration of ENERGY STAR products¹ and the upcoming compliance date for new DOE standards of June 13, 2019. The proposed IEF levels would provide significant cost-effective savings beyond the 2019 DOE minimum standards. Depending on the product category, the proposed IEF levels are 13% to 46% higher than the 2019 DOE standards.² For all categories in EPA's proposed scope, EPA found that payback periods would be less than three years.³

A future load-based test procedure for dehumidifiers could better reflect field performance and capture the potential benefits of variable-speed compressors. In the August 30 webinar, EPA noted that the potential benefits of variable-speed compressors are not captured in the current test procedure. EPA also requested comment on the impact of cycling on dehumidifier performance.⁴ We appreciate EPA's interest in exploring these topics. The CSA Group, a provider of testing, inspection, and certification services for equipment, is in the process of finalizing a new dynamic, load-based test procedure for central air conditioners and heat pumps. A similar load-based testing approach for dehumidifiers would better reflect how units actually

¹ The estimated 2017 market penetration was 88%:

https://www.energystar.gov/ia/partners/downloads/unit_shipment_data/2017/2017%20Unit%20Shipment%20Data%20Summary%20Report.pdf?f4d7-c3cd.

²

https://www.energystar.gov/sites/default/files/Dehumidifier%20Draft%201%20Version%205.0%20Webinar%20Slides_8%2030%2018_final.pdf, p. 16.

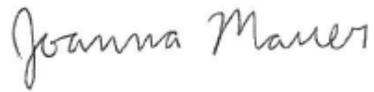
³ *Ibid.* p. 22.

⁴ *Ibid.* pp. 26, 31.

perform in the field including capturing the impacts of cycling losses, the potential benefits of variable-speed compressors, and the importance of control strategies.⁵

Thank you for considering these comments.

Sincerely,



Joanna Mauer
Technical Advocacy Manager
Appliance Standards Awareness Project



Lauren Urbanek
Senior Energy Policy Advocate
Natural Resources Defense Council

⁵ <http://aceee.org/files/proceedings/2018/index.html#/paper/event-data/p159>.