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April 2, 2021

Ms. Ga-Young Park
Climate Protection Partnership Division
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: ENERGY STAR® Version 8.1 Clothes Washers Specification Amendment

Dear Ms. Park:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the United States (U.S.) Environmental Protection Agency (EPA) Draft Amendment on the ENERGY STAR® Clothes Washer Specification Version 8.1 (V8.1).

The signatories of this letter, collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western U.S., serving over 32 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate this opportunity to provide the following comments about this draft amendment and commend EPA for revisiting the scope for ENERGY STAR Clothes Washer Specification. The most recent specification, Version 8.0 (V8.0), became effective in February 2018 and maintained the exclusion of combination washer-dryers. We fully support EPA expanding the scope to include combination washer-dryers that do not implement water-cooled drying technologies, and we recommend that EPA further evaluate the impact of combination washer-dryer products as connected devices as compared to individual washers or individual dryers. We support the elimination of the 80-minute maximum drying cycle for combination washer-dryer products and recommend that EPA consider expanding this exemption to other clothes dryer products with extended drying cycle times, such as heat pump dryers. We strongly urge EPA to consider the following comments:

- 1. The CA IOUs support the expansion of the ENERGY STAR clothes washer specification scope to include laundry centers and combination washer-dryers that do not include water-cooled drying technologies.**

EPA previously excluded combination washer-dryer products due to the lack of information on water-cooled drying products, but recently, air-cooled ventless combination washer-dryers have become available on the market, and the CA IOUs support inclusion of these products under the V8.1 Specification. Popular ventless drying technologies include condenser and heat pump dryers, both of which include air-cooled technology options and are often leveraged for specific use cases. Consumers can choose to install these products in a variety of locations to avoid space

and hookup limitations typical of stand-alone dryers, such as higher voltage electricity, a dedicated gas line, and/or vented exhaust.¹

The CA IOUs agree that water-cooled combination units should not be included in the revised specification. EPA should seek to better understand the market prevalence of water-cooled combination washer-dryers to fully determine relevance and availability of these products when considering future test procedure development. During the development of the ENERGY STAR Clothes Washer Specification V8.0, commenters highlighted the lack of a test procedure to appropriately capture water use, stating that “at least 20% of the total water consumption [of combination washer-dryer products]... was from the dryer.”² EPA also agreed with stakeholder assertions that water-cooled combination washer-dryers constitute a very small part of the U.S. market and that there is a lack of both publicly available data and test method for water usage.³ This knowledge gap remains as there is still limited public data on their water usage.

We recommend EPA work with DOE to ensure that the water consumed for condensing water-cooled products are captured in the ongoing Commercial and Residential Clothes Washer Test Procedure rulemaking,⁴ as this is an opportunity to collaborate on data collection and ensure that the entirety of water usage in these products is taken into account. Neither the current clothes washer or clothes dryer test procedure accounts for water consumption from water-cooled drying products; this water consumption should be included in the dryer test procedure as it is applicable to both combination washer-dryer products and standalone dryers. We believe that EPA and DOE should consider a modified test procedure that accounts for the impacts of the clothes washer and clothes dryer performance on one another for both laundry centers and combination washer-dryer units. Under the current test procedures, clothes washers (appendix J2 of 10 CFR 430)⁵ and clothes dryers (Appendix D1/D2 to 10 CFR 430)⁶ are tested as separate devices. For dryers, there are two main issues to be considered: water consumption from the drying cycle is unmeasured, and the remaining moisture content (RMC) resulting from the washer test is independent of the remaining moisture content for the dryer test setup. A consolidated test that uses the same load for washing and then drying would be more representative of actual field usage.

2. The CA IOUs recommend that EPA further evaluate the impact of connected combination washer-dryer products during demand response events while considering the full runtime of combination products.

The current draft amendment states that “any connected allowance may be applied only once.” This appropriately accounts for the capability of a washer or dryer to communicate with “consumer-authorized energy related commands,” such as in the case of a demand response

¹ ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria Draft Version 8.1: <https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Version%208.1%20Clothes%20Washer%20Draft%20Specification.pdf>.

² ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria Draft 1, Version 8.0, Comment Responses: https://www.energystar.gov/sites/default/files/asset/document/Draft%201%20Comment%20Responses_0.pdf.

³ Ibid.

⁴ DOE rulemaking, Energy Conservation Program: Test Procedure for Residential and Commercial Clothes Washers: <https://www.federalregister.gov/documents/2020/06/25/2020-13279/energy-conservation-program-test-procedures-for-residential-and-commercial-clothes-washers>.

⁵ Appendix J2 for 10 CFR 430: https://www.law.cornell.edu/cfr/text/10/appendix-J2_to_subpart_B_of_part_430.

⁶ Appendix D2 for 10 CFR 430: https://www.law.cornell.edu/cfr/text/10/appendix-D2_to_subpart_B_of_part_430.

event.⁷ For non-combined products, this would account for the number of appliances or operation cycles available at the time that event would be signaled. However, the combination washer-dryer product functions as both a washer and a dryer and is therefore run for a longer time than either washer or dryer products alone. Only attributing the DR connected allowance to a single product, washer or dryer, for combination units does not provide full credit for product runtime and availability in the case of a demand response event. Typical washrooms would have both a washer and a dryer, both of which could receive the connected allowance for ENERGY STAR certification. Therefore, we encourage EPA to consider full availability of combined washer-dryer products versus individual washer/dryer products and recommend that a combination washer-dryer that meets the connected criteria for both clothes washers and clothes dryers be given a connected allowance for both product class certification.

Appliance capability to participate in demand response events is growing in relevance. California, through its Senate Bill 49, and other states are looking to demand response as an option in their flexible demand standards.⁸ By further encouraging manufacturers to produce appliances capable of responding to demand response signals, ENERGY STAR certification could contribute to greater grid reliability.

3. The CA IOUs recommend that EPA re-evaluate the 80-minute maximum drying time requirement to exempt other dryer products or eliminate the requirement entirely.

The V8.1 Draft Specification references particular use cases for which combination washer-dryer units are desirable, such as to avoid space and hookup limitations. Ventless dryer products are also capable of avoiding some of these issues. Consumers purchase these units for installation convenience and anticipate longer dry times, which can extend to multiple hours. These ventless dryer products, including efficient heat pump dryers, are currently limited in certification due to the 80-minute test cycle restriction in 3B of the ENERGY STAR clothes dryer specification.⁹ Since EPA is including an exemption from this requirement for combination washer-dryers, we recommend that EPA also consider this exception for future ENERGY STAR heat pump dryers.

⁷ ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria Draft Version 8.1: <https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Version%208.1%20Clothes%20Washer%20Draft%20Specification.pdf>.

⁸ California Senate Bill 49: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB49.

⁹ ENERGY STAR Program Requirements Product Specification for Clothes Dryers, Eligibility Criteria Version 1.1: <https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Final%20Version%201.1%20Clothes%20Dryers%20Specification%20-%20Program%20Commitment%20Criteria%20and%20Eligibility%20Criteria.pdf>.

In conclusion, we would like to reiterate our support for EPA's Draft Amendment on the ENERGY STAR Clothes Washers Specification V8.1 while encouraging further evaluation of the connected criteria for combination products and re-evaluation of the 80-minute maximum drying time for all products. We thank EPA for the opportunity to be involved in this process.

Sincerely,



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