ENERGY STAR Dehumidifiers Draft 1 Version 5.0 Stakeholder Comment Matrix

Topic	Stakeholder Comment Summary	EPA Response
General		
Harmonization with DOE	One commenter supports the harmonization between EPA and DOE regarding definitions, product classes, test procedures and other related testing requirements.	Thank you for your comment.
Effective date	One commenter supports EPA's proposed timeline for the Version 5.0 revision and recommends an effective date of October 31, 2019.	Thank you for your comment and proposed effective date.
Data analysis	One commenter believes that EPA's analysis of current model performance and simple payback is based on inadequate data and urges EPA to rerun the analysis with new data from manufacturers.	EPA primarily based its Draft 1 Version 5.0 data analysis on information directly from the DOE Final Rule Technical Support Document for Residential Dehumidifiers. Payback periods were calculated using DOE's cost and energy use data, and model percentages, though estimated using currently-available EF data, align with the estimates that DOE presented in its Final Rule TSD based on IEF data. EPA followed up with manufacturers to collect IEF and cost data that was assessed in order to propose updated IEF criteria in a limited topic proposal.
Definitions and Scope		
Impact of scope on larger high efficiency dehumidifiers	One commenter states that not including the larger portable and whole-home dehumidifier product classes in Version 5.0 will impact consumers, the environment, and their manufacturing facility.	EPA has analyzed manufacturer performance and cost data for large portable and whole-home dehumidifiers and has decided to propose an IEF criteria of 3.30 L/kWh for each product category in a limited topic proposal before releasing a Final Draft specification. These levels should allow high efficiency products in both categories to be certified as ENERGY STAR while still offering differentiation and energy savings compared to the 2019 federal standards.

Portable dehumidifiers 50.01 pints/day or greater	One commenter states that their opinion is that the market for portable dehumidifiers >50 pints/day is growing and that EPA should reconsider their inclusion in the Version 5.0 specification.	EPA has assessed manufacturer performance and cost data and has proposed to include large portable dehumidifiers in scope for the ENERGY STAR Version 5.0 specification. EPA has detailed this inclusion in a limited topic proposal and is proposing IEF criteria of 3.30 L/kWh.
Certification Criteria		
Models that meet IEF levels	One commenter suggests that EPA assess its proposed IEF criteria based on model shipment data rather than on number of models.	EPA's model-based dataset serves as a proxy for the market and enables consideration of potential levels that ensure that the ENERGY STAR label provides real distinction in the market, and consumers have a choice of models bearing the ENERGY STAR.
IEF criteria	One commenter agrees with EPA's proposed IEF criteria and timing of the revision.	Thank you for your comment.
Criteria for whole-home dehumidifiers >8 cubic feet	One commenter believes that there will be zero products that can meet the IEF criteria for whole-home dehumidifiers >8 cubic feet case volume based on the criteria proposed in Draft 1.	EPA collected additional performance data from a manufacturer of these products and analyzed the data in order to propose a slight reduction to the Draft 1 IEF criteria. EPA is proposing a strict IEF level of 3.30 L/kWh for these products, which should be met by the most efficient products currently certified as ENERGY STAR.

	One commenter provided product performance data indicating that two of their models have the same product capacity, but different case volumes and efficiencies. Based on EPA's proposed IEF criteria, their model with the smaller case volume and lower efficiency will meet the ENERGY STAR IEF criteria for products less than or equal to 8 cubic feet case volume, but their model with a larger case volume and higher efficiency will not.	EPA has proposed to adjust its IEF criteria applicable to large whole-home dehumidifiers in order to ensure that efficient products can be available as ENERGY STAR in both whole-home dehumidifier product categories.
Case volume	One commenter states that whole-home dehumidifier performance criteria should not be based on product case volume.	EPA is maintaining its performance criteria based on case volume for whole-home dehumidifiers, consistent with product categories per DOE's federal standards.
Test Requirements		
DOE test waiver	One commenter reinforces the fact that products that require a waiver for DOE's testing procedures must demonstrate compliance with DOE's energy conservation standards and eligibility for ENERGY STAR based on the performance as determined by the waiver.	Thank you for your comment and confirmation that products using a waiver to comply with DOE's energy conservation standards will use the same waiver to demonstrate eligibility for ENERGY STAR.
Other / Miscellaneous		
Load-based testing for dehumidifiers	One commenter suggests that a load-based test procedure for dehumidifiers, similar to one that is currently being finalized for central air conditioners and heat pumps by The CSA Group, would be beneficial in representing field performance, especially for dehumidifiers employing variable speed compressors.	Thank you for your comment. EPA and DOE will consider this approach for future Dehumidifier test methods.

Portable versus whole-home	One commenter suggests that the distinction between portable and whole-home dehumidifiers should be eliminated as many consumers use the units interchangeably. The commenter suggests setting a high bar for both categories. The commenter also suggests that EPA help alleviate potential consumer confusion through education about use case, product capacity, product case volume, and performance.	EPA understands that some niche installations could be satisfied by portable or by whole-home dehumidifiers, but in general portable and whole-home dehumidifiers are not typically installed for the same reasons, nor do the physical configurations of most portable and whole-home dehumidifiers allow them to be used interchangeably. EPA has proposed IEF criteria in a limited topic proposal that sets a high bar for large portable and whole-home dehumidifier performance. EPA is maintaining distinction between portable and whole-home dehumidifiers for this specification revision, but appreciates the stakeholder input regarding the potential drawbacks. EPA is working on marketing and educational materials to inform consumers of the differences between portable and whole-home dehumidifiers as well as product capacities, case volumes, and IEF.
Confusion due to use case and size of dehumidifier		