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To Our Colleagues at ENERGY STAR:

On behalf of Therma-Stor and its subsequent dehumidification brands of Santa Fe, Ultra-Aire, Phoenix and Quest, I would like to provide the requested information as a follow-up to our conference call on September 24, 2018 regarding our comments on the draft proposal titled Draft I Version 5.0 ENERGY STAR Dehumidifiers Specification. We hope this information reinforces our positions and aids the ENERGY STAR program move forward on a path that is best for the U.S. consumer and our environment.

Elimination of portable dehumidifiers >50PPD [Draft 1, Version 5.0, 2. B.]

As discussed, it is our stance that >50 PPD portable dehumidifiers is larger than 1% of the dehumidifier market and the cost to move from a standard to high efficiency unit provides a reasonable Life Cycle Cost and Payback for the consumer. Therefore, the >50 PPD units should be included in the ENERGY STAR program.

In Table I, we have provided the requested information

Table 1: DOE Capacities and Efficiencies for Portable & Whole Home Dehumidifiers

Portable Dehumidifiers		DOE -65F 60	AHAM- 80F 60% Test Conditions					
Brand	Model	Capacity (PPD)	IEF (L/kWh)	Capacity (PPD)	EF (L/kWh)	Price ((USD)	
Santa-Fe	Compact 70	47	1.94	70)	5	827	
Santa-Fe	Advance 90	61	2.35	90		6.1	1037	
Santa-Fe	Advance 120	79	2.33	120)	6.1	1245	
Santa-Fe	Impact 105	76	3.38	105		8.8	1558	
Santa-Fe	Impact 155	107	2.81	155		7.3	1665	
Santa-Fe	Classic	79	2.64	110		6.3	1270	
Whole Hor	ne Dehumidifiers	DOE- 73F 60% @ 0	0.2 IWG Test Conditions	AHAM- 80F (50% Test Conditi	ons		
Brand	Model	Capacity (PPD)	IEF (L/kWh)	Capacity (PPD)	EF	Cabin	et > 8 ft3 P	rice (USD
Ultra-Aire	MD33*	32^	2^	33		2 NO		769
Ultra-Aire	70H	58	2.13	70		2.4 NO		962
Ultra-Aire	98H	75	2.45	98		2.95 NO		1248
Ultra-Aire	120H	94	2.37	120		2.9 NO		1306
Ultra-Aire	120V	104^	3.29^	120		3.6 YES		1460
Ultra-Aire	XT105H	87	3.41	105		4.2 YES		1872
Ultra-Aire	XT155H	132	3.15	155		3.4 YES		2018
Ultra-Aire	XT205H	168	2.45	205		2.7 YES		2662
*MD33 is a	an in-wall ductless o	dehumidifier designed f	or multi-family applicatio	ns - tested at 0.0	IWG			
^Extrapola	ted Values							

Finally, the question arose in our phone call regarding appropriate run times for dehumidifiers in general and specifically >50 PPD portables installed in larger homes. The question is if the >50 PPD units have equal or longer run time than typical portables because they are being sold to larger homes in more humid climates. Our assertation is that most consumers move to the larger portable units after they have used multiple smaller portable units or were advised by a contractor with sizing experience. Thus the larger portable units are properly sized for the homes they are in and would run at least the same number of hours as <50 ppd dehumidifier in an average sized home. Unfortunately, we do not have data to support this currently. We will work on developing this data and welcome any partnership with the EPA or others that would develop an extensive data set on dehumidifier runtime and water removal for various homes in varying climates.

Sincerely,

Todd DeMonte President/CEO