



# Therma-Stor

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December 4, 2018

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 submit the enclosed comments on the limited topic proposal titled *ENERGY STAR Dehumidifiers Version 5.0 Limited Topic Proposal* issued on November 26, 2018 for your consideration in developing the final program requirements.

Therma-Stor is strong supporter of the ENERGY STAR program and the value it provides to consumers, in the U.S. and abroad, in the selection of the most energy efficient means to provide dehumidification to their homes. We see the ENERGY STAR program as a key differentiator for many manufacturers and is highly recognizable by consumers to select the best equipment for protecting their homes from IAQ issues and improve overall comfort.

#### **Portable Dehumidifier IEF**

We would like to thank the EPA for their diligent efforts to further understand this market segment. We believe that including portable units greater than 50 pints/day will help the U.S. consumer make better decisions for their dehumidification needs.

#### **Whole-Home Dehumidifier IEF**

Therma-Stor believes that setting the IEF for greater than 8 ft<sup>3</sup> whole-home units to 3.30 L/kWh or above is setting the efficiency bar to a relatively high but achievable level that will challenge all manufacturers to improve product line efficiency for the better of the industry and environment. We also agree that setting the IEF equal to the greater than 50 pint/day portable units is a sensible move to prevent the replacement of whole home dehumidifiers with portable units. Our gratitude goes out to the EPA for these sensible decisions and we believe the top tier of our product line can be modified to achieve ENERGY STAR certification given an appropriate amount of time.

To that end, we are asking for the effective date of the specification to be set in the first quarter of 2020. We understand this date is pushed back from the original timeline, established in the Note on page 5 of the original Draft 1, but it will give the engineering department of our company and our worthy competitors the necessary time to make the improvements to affected product lines to minimize the disruption to consumer choices for ENERGY STAR dehumidifiers.

Thank you for your dutiful consideration of this final request. As always, we welcome any further questions or request for comment on this ENERGY STAR specification.

Sincerely,

Todd DeMonte

President/CEO