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NRDC and ASAP Comments on Commercial Dryers - Sept 1 2017

Additional submitted attachment is included below.

NRDC and ASAP Comments on CEC Aug. 3, 2017 Staff Workshop on Commercial Clothes Dryers

2017 Appliance Efficiency Pre-Rulemaking
Docket Number 17-AAER-01

Sept. 1, 2017

Submitted by:
Pierre Delforge, Natural Resources Defense Council
Joanna Mauer, Appliance Standards Awareness Project

On behalf of the Natural Resources Defense Council and our more than 380,000 members and online activists in California, and the Appliance Standards Awareness Project (ASAP), we respectfully submit these comments on the California Energy Commission's (CEC) Aug. 3, 2017 staff workshop on commercial clothes dryers.

The Natural Resources Defense Council is an international nonprofit environmental organization with more than 1.3 million members and online activists. Since 1970, our lawyers, scientists, and other environmental specialists have worked to protect the world's natural resources, public health, and the environment. NRDC's top institutional priorities are curbing global warming and creating a clean energy future. Energy efficiency is one of the quickest, cleanest, cheapest solutions to global warming and other energy-related problems. Cost-effective energy efficiency standards help to ensure that consumer and commercial products provide the same level of comfort and service using less energy, with benefits for consumers, the environment and the electricity grid.

ASAP is a coalition that includes representatives of efficiency, consumer and environmental groups, utility companies, state government agencies, and others. Working together, the ASAP coalition seeks to advance cost-effective efficiency standards at the national and state levels through technical and policy advocacy and through outreach and education.

Appliance standards are a key strategy to achieve California's clean energy and climate goals. California's long track record of leadership on appliance and building efficiency standards has

saved Californians $ 75 billion in utility bills since 1975.[1] With changing federal government priorities California's leadership is needed more than ever to enable the state, the country, and the world to stave off the worst impacts of climate change while developing a prosperous and equitable clean energy economy.

We strongly support the Commission's efforts and the open and transparent process to develop a test procedure for commercial clothes dryers. We encourage CEC to finalize the test procedure as soon as possible and offer the following supportive comments:

Commercial clothes dryers use a substantial amount of energy and are currently unregulated. There are an estimated half a million commercial clothes dryers in use in California's multifamily buildings, laundromats, hotels and other businesses with on-premise laundry facilities. These dryers consume an estimated 900 GWh of electricity and 260 million therms of natural gas per year, costing California businesses, from laundromats to apartment owners (and indirectly tenants) $440 million annually in operating costs.

There are currently no test procedures for commercial clothes dryers. Developing a test method is a critical first step to empower business owners with the information they need to make the right equipment purchasing decisions when considering lifecycle operating costs, and to pave the way for potential future energy efficiency policies such as incentive, labeling, and standards programs that have the potential to save California businesses millions.

Preliminary testing by the California investor-owned utilities (CA IOUs) using their proposed test method shows a large spread in efficiencies in products on the market: Dryers of similar size can have dramatically different efficiency levels, showing that there is room for major efficiency gains in some models. Further, the spread in available efficiencies suggests that technology to significantly improve dryer efficiency already exists in commercially-available products, and therefore it is technologically feasible to design and manufacture models that would save a considerable amount of energy.

Research by the IOUs shows that commercial dryer operators care about the energy use of their dryers principally for cost reasons, but also for sustainability reasons, particularly for large international hotel chains. However, the quantitative information available on dryer energy use is sparse, and often impossible to compare due to a lack of a standardized test method. While there is a test method for residential dryers, it does not reflect commercial equipment and the distinctive commercial operating conditions.

The proposed test method developed by the IOUs and their consultant goes to great length to take into account specific conditions in commercial dryer operations, and to balance representativeness, repeatability and reproducibility, with a reasonable test burden. In particular, we believe that the proposed test load reflects the importance of reasonably

[1] http://www.energy.ca.gov/renewables/tracking_progress/#efficiency

representing real-world conditions while also accounting for the importance of repeatability and reproducibility. Further, we believe that the proposed set of test runs would capture the potential range of performance in real-world installations without imposing an undue test burden.

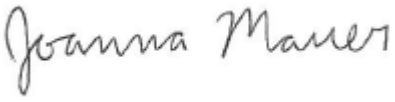
Dryer manufacturers have had, and continue to have plenty of opportunities to contribute data and comments to inform the development of the test procedure before it is finalized.

NRDC encourages CEC to finalize the test procedure as soon as possible, because standards development organizations have not come up with an alternative so far, despite this rulemaking having been open since 2012. Five years was ample time for standardization organizations to develop a test method should they have wanted to.

We strongly support CEC's inclusion of both electric and gas dryers in the scope of the test procedure development. While the majority of commercial dryers today are gas-fired, there are important opportunities for efficiency gains in electric dryers, particularly with emerging heat pump technology that can cut energy use in half or more relative to a conventional electric dryer. The test procedure is foundational to enable the market to value the efficiency benefits of this new technology.

We appreciate the opportunity to provide this input, and thank CEC for its careful consideration of our comments.

Respectfully submitted,



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