

May 9, 2013

Via E-mail

Mr. Harinder Singh
California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

docket@energy.state.ca.us

Re: Docket No. 12-AAER-2D – Commercial Clothes Dryers

Dear Mr. Singh:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the California Energy Commission's Invitation to Participate in the development of appliance energy efficiency measures (March 25, 2013), which seeks information from interested parties as it considers establishing minimum operating efficiency standards, test procedure, marking & labeling requirements, and other efficiency measures.

The Association of Home Appliance Manufacturers (AHAM) represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM appreciates the opportunity to comment on California Energy Commission's Invitation to Participate in the development of appliance energy efficiency measures and would be glad to further discuss these matters with the California Energy Commission.

Sincerely,



Kevin Messner
Vice President, Policy & Government Relations

California Energy Commission

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**Comments on the Invitation to Participate
in the Development of Appliance Energy Efficiency Measures**

I. Issue #1: Product definition: what differentiates a commercial clothes dryer from a residential dryer?

Commercial clothes dryers can be segmented in two primary categories: (1) residential-style dryers used for multi-housing and Laundromats that are built on the same platform as residential clothes dryers and (2) on-premises/industrial laundry equipment typically used in hotels, hospitals and other large institutions. AHAM represents manufacturers of commercial clothes dryers that are built on the same platforms as residential dryers and recommends that these commercial clothes dryers be excluded from the scope of CEC's rulemaking. Residential-style commercial clothes dryers are very similar mechanically to residential clothes dryers, but typically contain additional features such as card readers, coin slots, display screens and/or data communication tools (for remote notifications and diagnostics). These products are developed to withstand the rigors of continuous daily use and to decrease cycle times to reduce wait times for consumers.

II. Issue #2: California sales by model and estimated retail price. What proportion use natural gas as a fuel source?

In 2012, AHAM estimates that for commercial dryers that are built on the same platform as residential dryers, there were approximately 5,250-5,750 electric and 14,250-14,750 gas commercial dryers shipped to California. These relatively low numbers of shipments of this product type to California show little opportunity for any significant energy savings by developing an efficiency standard for these niche products.

III. Issue #3: Test methods used to measure product efficiency and performance?

AHAM is not aware of any test methods for the type of commercial dryers we represent.

IV. Issue #4: What are the limitations of the test methods? Any improvement needed?

There are no test procedures for commercial clothes dryers that are built on the same platform as residential dryers. The current Department of Energy (DOE) test procedure for clothes dryers is not intended nor would it be applicable to these types of commercial clothes dryers for the reasons discussed below.

The DOE test procedure load side is inappropriate for commercial dryers. Commercial dryers need to be designed to dry heavier loads than standard residential units because they are generally coin operated and people are trying to dry as many clothes as possible at the lowest cost. Also, the cycle time for coin operated dryers is shorter because Laundromat customers want to spend as little time as possible at the Laundromat drying clothes.

Customers of commercial dryers want to receive the same drying time for the same price so coin operated dryers generally use timed-drying to ensure customer satisfaction. The DOE test procedure severely penalizes timed-dry dryers. The field use factor in the DOE test procedure for clothes dryers with only time termination control systems is 1.18, which is a severe energy penalty for manufacturing and selling timed-dry only residential dryers. Also, there are states with laws (*e.g.*, New York *CLS Gen Bus* § 399-*f* and Massachusetts *ALM GL*

ch. 93, § 18B) that require Laundromats to post signs stating how much drying time the consumer receives when they put in their coins to start the dryer. Further, there are local Weights & Measures officials who verify time that is purchased. In California's Division of Measurement Standards Training Manual for Weights and Measures officials, it states the following—

*Time is a commodity because we can buy things by units of time. Examples could be hiring a person to work for us by the hour, or **buying a certain amount of time in a clothes dryer** (emphasis added).*

These state laws and local Weights and Measures verification programs reinforce our view that customers for commercial dryers that are built on the same platform as residential dryers expect the dryer to run the same amount of time based on how much money they pay. Therefore, auto-termination controls are not generally used, and, hence, using the DOE test procedure for residential dryers that severely penalizes timed dryers would not be appropriate for use with commercial dryers.

V. Issue #5: Are there commercial clothes dryers designed to work specifically with a particular commercial clothes washer?

Commercial clothes dryers are designed to be operated with soft-mounted commercial clothes washers to ensure cycle times are similar and load size capabilities are matched.

VI. Issue #6: Are there any existing commercial clothes dryer efficiency specifications or standards?

AHAM is not aware of any existing commercial clothes dryer efficiency specifications or standards.

VII. Issue #7: How many small businesses are involved in the manufacture, sale, or installation of these products?

According to the Coin Laundry Association, there is estimated to be approximately 3,500-4,000 Laundromats in California.