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Via E-mail: docket@energy.state.ca.us

May 9, 2013

Mr. Harinder Singh
California Energy Commission
Docket Office, MS-4
Re: Docket No. 12-AAER-2D – Commercial Clothes Dryers
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

12-AAER-2D

TN # 70720

MAY 09 2013

Subject: **Response to CEC's Request for Information**
Docket # 12-AAER-2D - Commercial Clothes Dryers

Dear Mr. Singh:

Alliance Laundry Systems is North America's largest commercial laundry equipment manufacturer. We manufacture residential and commercial clothes washers and dryers for the US market under the Speed Queen™, Huebsch™, Unimac™, IPSO™, and Cissell™ trademarks in Ripon, Wisconsin. We employ approximately 1,400 people. Thank you for the opportunity to comment.

1.) We generally support the comments submitted the trade association, Association of Home Appliance Manufacturers (AHAM).

2.) Product Definition and Scope:

We define 2-categories: Residential-style built on same platform as a "residential clothes dryer", but containing construction differences including:

- a) Heavy duty control hood and tops for more rugged usage,
- b) Security additions to reduce vandalism or theft of coins,
- c) Capability to work with vend devices such as coin slides, coin drops, debit card readers, and central pay machines.
- d) Short decreased dry cycle time to meet customer demands / needs.
- e) Typically of 20-pound capacity rating or less. Ours are rated at 18-pounds dry textile load.
- f) Some come in "stacked" versions Dryer/Dryer and also in versions of stacked Washer/Dryer.
- g) Heat types of: Electric element, or Gas-fired.
- h) Vended coin-operated versions are typically used in the "multi-family housing" segment of commercial market, while some non-vended versions are typically found in the "on-premise-laundries (OPL)" segment of the commercial market and used in some small-entities such as, restaurants, beauty shops, health clubs.

Large-chassis-style (termed "Tumblers") built on a whole unique platform.

- a) Tall product of 5-feet high or more in height. Some come in "stacked Dryer/Dryer version to efficiently utilize floor space in installations.
- b) Large Glass Loading Door
- c) Capacity range from 25 pounds to 200 pounds of dry textiles. The clothes load cylinder of the tumbler is sometimes stated in liters of volume.
- d) Heat types of: Electric element, or Gas-fired, or Steam.

- e) Vended coin-operated models found typically in Laundromats, range from 25 pounds up to 55 pounds.
Non-vended models are found typically in the “on-premise-laundries (OPL)” segment of the commercial market in hotels, hospitals, nursing homes, prisons, universities having a central laundry.

Alliance Laundry Systems opposes minimum standards for Commercial Clothes Dryers for numerous reasons, regardless of category or size.

3.) Existing Test Procedures: We know of no existing test procedure.

4.) Existing Standards / Under Development Standards:

Electrical Safety – UL 2158 *Electric Clothes Dryers* (for residential-style)

UL 1240 *Electric Commercial Clothes Drying Equipment* (for large-chassis)

Gas-Safety – ANSI Z21.5.1.a Gas Clothes Dryers Volume I Type 1 Clothes Dryers (residential-style)

ANSI Z21.5.2.a. Gas Clothes Dryers Volume II Type 2 Clothes Dryers (large-chassis)

Energy Efficiency: **Inappropriate** US DOE Residential Clothes Dryer Minimum Standard
10CFR430.32.h.1, .2 and .3

5.) Product Lifetime:

Product must meet the requirements of the 3-segments of the commercial market, Laundromats, Multi-family housing, and On-Premises-Laundry (OPL). These are very different than “typical consumer residential” models, where usage per US DOE rulemakings shows less than 1-usage cycle per day, and mean lifetimes of 16-years. In multi-family housing 2 ½ cycles per day are the norm, and 4-cycles per day are the norm for Laundromats. It is best if the CEC contacts the trade associations CLA (Coin Laundry Association) and MLA (Multi-housing Laundry Association) for accurate usage cycle and product lifetimes. However we know our market customers expect commercial clothes dryers to last 10 to 15 years depending on the installation site. With higher daily usage and similar long lifetimes, Commercial Clothes Dryers have higher expectations and requirements than “residential clothes dryers”.

6.) Retail Price:

CEC should contact the buyers of Commercial Clothes Washers in the State of California for this important information, to obtain the most accurate information. These would be multi-family housing route operators, Laundromats owners, and your own state universities.

7.) California Shipments:

Residential-style built on same platform as “residential clothes dryers”:

We support AHAM’s response on the 2012 shipments to California limited to the “residential style built on same platform as residential clothes dryers”.

Large-chassis Tumblers:

For models 25 and 30 pound including 30 pound stacked models, we estimate the total market has annual shipments of less than 1,500 units. Almost all are gas-fired heat type.

8.) Design cycles:

Commercial clothes dryer owners desire little change to their reliable, rugged equipment. Product designs tend to exist for a decade or more with only minor improvements.

We appreciate the opportunity to comment on the CEC’s invitation to participate in CEC’s rulemaking.

Sincerely,



Philip J. Manthei
Sr. Staff Engineer