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

July 22, 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



Subject: **Proposal to Docket # 12-AAER-2D - Commercial Clothes Dryers**

Dear Mr. Singh:

Alliance Laundry Systems (ALS) 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.

We propose that the California Energy Commission (CEC) not establish energy efficiency standards for Commercial Clothes Dryer for to the following reasons:

- 1.) Minimal energy savings potential.
- 2.) Required increased drying cycle-time for any efficiency improvement, conflicts with user-need for convenience, and commercial laundry timely through-put. Proposals to improve efficiency typically reduce heat energy input and tumbles the clothes at lower heat for longer period. But that is not what consumers want. Users and equipment owners want to complete the laundry cleaning and drying process faster, not longer.
- 3.) Lack of uniform accepted national test procedures. US DOE Test Procedure for Residential Clothes Dryers is not appropriate for Commercial Dryers, and there exists no national efficiency standard at all for the larger Tumble dryers.
- 4.) Significant cost increases to consumers. (commercial equipment owners).
- 5.) Significant impact on small businesses (Laundromat owners, equipment distributors, multi-housing operators)
- 6.) Possible conflict with other state or municipality regulations on "vended equipment" where "time" is what the customer is paying for. Weights and Measures Regulations on vend devices can not have a "variable cycle completion time", as would be the case if equipment was required to have moisture sensing or other sensor to determine when to end cycle. Today, commercial coin-op (and card-op) dryers vend amount is per minutes of time.

In summary, we propose that the CEC not establish a minimum efficiency standard for Commercial Clothes Dryers. Many issues exist that will utilize resources to resolve, of the Commission, standards advocates and manufacturers that can be used more effectively elsewhere to address California energy conservation.

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

Sincerely,

Philip J. Manthei  
Sr. Staff Engineer