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July 29, 2013

Via E-mail

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

docket@energy.ca.gov

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

Dear Mr. Singh:

On behalf of the Association of Home Appliance Manufacturers (AHAM), please find attached our proposal to the California Energy Commission's 2013 Appliance Efficiency Pre-rulemaking, Docket No. 12-AAER-2D – Commercial Clothes Dryers.

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 submit this proposal to the California Energy Commission as they consider the development of appliance energy efficiency measures and would be glad to further discuss these matters with the Commission.

Sincerely,

Kevin Messner
Vice President, State Government Affairs





California Energy Commission 2013 Appliance Efficiency Pre-Rulemaking

Proposal for No Efficiency Standards for Commercial
Dryers (Docket No. 12-AAER-2D)



Leadership > Knowledge > Innovation

Purpose

This proposal is submitted representing the views of the appliance manufacturing industry. The Association of Home Appliance Manufacturers (AHAM) represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's more than 150 members employ tens of thousands of people in the U.S. and produce more than 95% of the household appliances shipped for sale within the U.S. 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 proposes that the California Energy Commission (CEC) does not establish efficiency standards for commercial dryers due to the lack of a benefits in relation to the cost, minimal energy savings potential, significant increased costs to consumers, and significant negative impacts on small businesses.

Background

We propose that the CEC does not consider mandatory efficiency standards for commercial dryers. There are essentially two categories of commercial dryers. Some commercial dryers are built on the same platform as residential dryers and can be found in Laundromats and multi-residential buildings ("residential style commercial dryers"). These dryers are usually coin operated so the user is paying for "dry time." AHAM does not represent the other, larger commercial dryer.

An efficiency standard for commercial dryers should not be pursued by the CEC. The time and resources needed to develop a test procedure, and analyze possible levels and the related cost/benefit analysis for manufacturers and consumers, would not be justified. Based on AHAM's analysis, only approximately 5,500 electric dryers were shipped into California in 2012 so the total energy impact of the 2012 California shipments of residential commercial dryers is not high.

There are no test procedures for residential style commercial dryers. The current Department of Energy test procedure for residential dryers is not applicable to residential style commercial dryers for a number of reasons expressed in more detail below. Further the negative impact to thousands of small business and the many California residents that use these dryers does not justify a mandatory standard that would most assuredly increase the costs for people who use these dryers, many of whom are in economically stressful situations already and do not have dryers of their own.

Product Scope: Commercial Clothes 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. 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. Further, 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.

Test Procedures for Commercial

AHAM is not aware of any test procedure for residential style commercial 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.

First, The DOE test procedure load size 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.

Further, 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.

Another reason not to pursue mandatory efficiency standards for commercial dryers is that other state laws and policies would conflict with this objective. 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. Should CEC pursue efficiency standards, they should undergo an exhaustive review of current California laws to ensure the effort does not cause conflicting requirements. However, to ensure the most efficient market place for commercial dryers, it is important to have a North American marketplace for these products. Hence, these laws in other states should be of concern to CEC to prevent Californians from having to buy specialized products that are designed just for California. We realize California has pursued policies that would lead to a California-specific product, *e.g.*, vehicle smog equipment, but AHAM doubts the benefits would out-weigh the costs and resources for a similar endeavor for a few commercial dryers. With that said, we are aware that California Weights & Measures officials verify time that is purchased for products throughout the state. In California's Division of Measurement Standards Training Manual for Weights and Measures officials, it specifically states the example of buying time for clothes dryers --

*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.

Number of Residential Style Commercial Dryers Shipped to California

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.

Energy Savings Opportunity is Minimal, Costs Implications High

The energy savings potential for residential style commercial dryers is minimal if any based on the limitations that exist from other state and local laws that would restrict some feature and design changes. Based on data AHAM collected from its member companies, only approximately 5,500 of these units were shipped into California in 2012 so the total energy impact these products are having throughout the whole state is not high.

Any efficiency standard should analyze the implications it may have on consumers and small businesses. According to the Coin Laundry Association, there is estimated to be approximately 3,500-4,000 Laundromats in California. These small businesses would be significantly impacted by any regulations in this area as would their customers. Should CEC pursue a mandatory efficiency standard, an analysis of how these businesses would be negatively impacted and the increased costs that the California residents would have to incur to dryer their clothes.