



NATURAL RESOURCES DEFENSE COUNCIL

California Energy Commission

DOCKETED
12-AAER-2D

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July 29, 2013

California Energy Commission
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5512

Via e-mail: docket@energy.ca.gov

RE: Commercial Clothes Dryer Standards – **Docket #12-AAER-2D**

On behalf of the Natural Resources Defense Council (NRDC) and our more than 250,000 members and online activists in California, we respectfully submit this response to the Commission's Invitation to Submit Proposals dated June 13, 2013.

Enclosed is NRDC's proposal under Docket #12-AAER-2D for Commercial Clothes Dryers.

We appreciate the opportunity to present our proposals. Please let me know if you have any questions.

Respectfully submitted,

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Proposal for Standards Commercial Clothes Dryers Docket No. 12-AAER-2D

Appliance Efficiency Standards and Measures

for California Energy Commission's Invitation to Submit Proposals

Submitted By:

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July 29, 2013



On behalf of the Natural Resources Defense Council (NRDC) and our more than 250,000 members and online activists in California, we respectfully submit this response to the Commission's Invitation to Submit Proposals dated June 13, 2013.

NRDC has reviewed the Investor Owned Utilities (IOUs) standards proposal for commercial clothes dryers and is in agreement with their analysis, savings estimates and proposal. Rather than repeat much of their content, NRDC highlights below key considerations regarding the IOU-proposal.

There are three main types of commercial dryers: those used in multi-family laundromats (MFL) which are typically similar in size to residential units and are found in shared laundry facilities in multi-family buildings, those used in coin-operated laundromats (COL), and those used in on-premise laundromats (OPLs), such as those in hotels, health care facilities and laundry service facilities. Commercial clothes dryers come in a wide range of capacities from 20 pounds to over 400 pounds. Residential sized machines and 30 pound machines are the most common and were the focus of the IOU's testing. Larger capacity machines are generally OPLs and come in a wide range of sizes with limited product availability at any given size. For this reason, the IOUs focused their testing on the more common MFL and 30 pound units ("Size A" units).

Why commercial clothes dryer standards are necessary

There are currently no existing standards for commercial clothes dryers despite their large energy use and potential for efficiency improvement. The IOUs estimate that commercial clothes dryers in California currently use 222 million therms of natural gas and 321 gigawatt-hours of electricity per year. There are several technology options that can be used to reduce energy use in commercial clothes dryers, including improving sensing and controls strategies, modulating the heat source, and heat recovery.

The proposed standards are technologically feasible and cost effective

The IOUs found a range of efficiencies for both MFL and Size A units that they tested, which form the basis of their standards proposal. The proposal would require MFL gas dryers to be 2.5 percent better than

the baseline and would require Size A gas dryer to perform 8 percent better than the baseline. These efficiencies are feasible based on the models tested and did not have any incremental cost correlated to efficiency, making these efficiency levels cost-effective.

Residential test procedure applicable to commercial clothes dryers

Since there is currently no separate test procedure for commercial clothes dryers, the IOUs have proposed to use the DOE residential test procedure with the weight of the test load scaled based on dryer capacity. Commercial and residential dryers are very similar in their operation, with the main differences being the presence of coin operation and size. The IOUs conducted testing using the residential test procedure on commercial dryers and found that it was applicable. Given both the similarities between residential and commercial dryers and the results of the IOUs testing, it makes sense to use the DOE residential test procedure as the basis for the test procedure for commercial dryers.

Proposed standards will save energy, money and reduce carbon emissions

The IOUs estimate that the proposed standards will save 11.7 million therms of natural gas per year once the stock fully turns over, reducing emissions by 62,000 MT CO₂ equivalent. They will also save Californians \$12 million by 2019. Also, the IOUs recommendation to test and list larger commercial dryers that are not covered by the proposed standards would provide information for utility programs, incentives, and other future activities, potentially leading to further benefits.

For the reasons discussed above, NRDC urges the Commission to adopt the IOU's proposal for commercial clothes dryers.