

Call with the US Department of Energy

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Participants

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Summary

CEE and DOE staff discussed the importance of relying on the DOE test method as the sole metric for efficiency and energy use reporting. DOE staff shared that ENERGY STAR was permitted to collect data from manufacturers which test clothes dryers at different cycles other than those specified by the DOE test method for the purposes of issuing an emerging technology award.

Staff from DOE and Navigant Consulting provided answers to the following questions posed by CEE based on the previous rulemaking for the DOE clothes dryer test method.

1. CEE question: why did DOE decide not to require the improvements in evaluating automatic termination features specified in Appendix D2 for all clothes dryers?

Navigant and DOE response: It was result of the timing of the test procedure (2013) in relationship to the minimum efficiency standard (2011). This change in the test procedure would have significantly impacted the measure of consumption, which would have required a revision to the minimum efficiency standard. It is therefore only required in Appendix D2.

2. CEE question: is there a bridge or conversion factor between the performance of clothes dryers according to Appendix D1 and D2?

DOE response: There is no conversion factor, but there are models that have been tested to both D1 and D2 that provide a rough estimate of a differential.

3. CEE question: why is the dryer only tested once versus multiple cycles as with clothes washers?

Navigant response: the dryer test cycle is designed to provide an average representation of consumer use. Based on available field testing, they believe the current cycle is the most

representative of consumer use and therefore have not identified a need to specify additional cycles.

4. CEE question: why does DOE use two-dimensional test cloths versus test cloths more representative of real world clothing loads?

DOE and Navigant response: This was of significant discussion in the last rulemaking. Testing clothes dryers with other clothing loads that provide greater mixture of fabrics increases test-to-test and lab-to-lab variation. It's also hard to specify consistent load overtime as brands and cloths change. The DOE cloths provide the most consistent option. This topic was also raised in the current RFI and so is being considered again.

5. CEE questions: how did DOE determine 4.4 cu ft as the cut off for standard versus compact units? What is the basis for the 8.45 lb test load for standard sized units? What is the basis for the 3 lb test load for compact units?

Navigant response: In the 1997 DOE remaking, it references AHAM standard (1992) which specified a 7 lb and 3lb load. DOE updated the standard size 2011 to 8.45 lb load based on historical trends in tub values. They were unsure about where the 4.4 cu ft definition came from but it's likely from the AHAM standard as well.