

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy  
Consumer Federation of America  
Natural Resources Defense Council

November 15, 2021

Dr. Stephanie Johnson  
U.S. Department of Energy  
Building Technologies Program, EE-5B  
1000 Independence Avenue SW  
Washington, DC 20585

**RE: Docket Number EERE–2021–BT–DET–0022/RIN 1904–AF25: Proposed Determination of Air Cleaners as a Covered Consumer Product**

Dear Dr. Johnson:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), Consumer Federation of America (CFA), and Natural Resources Defense Council (NRDC) on the proposed determination of air cleaners as a covered consumer product. 86 Fed. Reg. 51629 (September 16, 2021). We appreciate the opportunity to provide input to the Department.

In the proposed determination of coverage, DOE has preliminarily determined that coverage of air cleaners is necessary and appropriate to carry out the purposes of EPCA. We strongly support adding air cleaners as a covered product. DOE notes in the proposed determination that ENERGY STAR market data for 2019 indicated that total shipments of portable air cleaners were about 5.2 million.<sup>1</sup> The most recent ENERGY STAR data for 2020 reported 6.5 million shipments of ENERGY STAR-certified units;<sup>2</sup> total shipments are likely significantly greater, and product demand in the residential sector is projected to grow at a CAGR of 6.2% through 2028.<sup>3</sup> Furthermore, the efficiencies of current air cleaner models vary dramatically. According to EPA, ENERGY STAR-certified room air cleaners are more than 25% more efficient than standard models.<sup>4</sup> And while the minimum clean air delivery rate per watt (CADR/W) for smoke in the current ENERGY STAR specification ranges from 1.9 to 2.9 depending on smoke CADR,<sup>5</sup> the most efficient models certified to ENERGY STAR have rated smoke CADR/W values as high as 14.8.<sup>6</sup> These data suggest that air cleaners represent a large potential for energy savings.

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<sup>1</sup> 86 Fed. Reg. 51632-33.

<sup>2</sup>

[https://www.energystar.gov/sites/default/files/asset/document/2020%20USD%20Summary%20Report\\_Lighting%20%20EVSE%20Update.pdf](https://www.energystar.gov/sites/default/files/asset/document/2020%20USD%20Summary%20Report_Lighting%20%20EVSE%20Update.pdf). EPA did not report the ENERGY STAR market penetration of room air cleaners for 2020 “due to indications of dramatic changes in the market in 2020 that are inconsistent with previous market trends.”

<sup>3</sup> <https://www.grandviewresearch.com/industry-analysis/us-air-purifier-market>.

<sup>4</sup> [https://www.energystar.gov/products/air\\_purifiers\\_cleaners](https://www.energystar.gov/products/air_purifiers_cleaners).

<sup>5</sup>

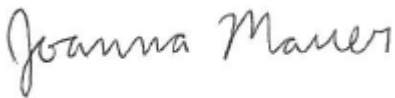
[https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%202.0%20Final%20Room%20Air%20Cleaners%20Program%20Requirements\\_0.pdf](https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%202.0%20Final%20Room%20Air%20Cleaners%20Program%20Requirements_0.pdf).

<sup>6</sup> <https://www.energystar.gov/productfinder/product/certified-room-air-cleaners/results>. Accessed November 12, 2021.

We have submitted joint comments with AHAM recommending a definition for “residential room air cleaner.” The proposed determination of coverage includes a proposed definition for “air cleaner” which would encompass additional types of air cleaners, in particular whole-home units. We encourage DOE to take an expansive approach in determining the scope of coverage to cover all types of consumer air cleaners. Such an approach would be consistent with DOE’s proposal in the proposed determination.

Thank you for considering these comments.

Sincerely,



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