

**U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
Energy Star Refrigerators and Freezers – Residential  
(Various Sizes and Configurations)  
Room 1E245 in Washington, DC – July 18, 2002**

The following document is composed of two sets of comments. The first series of comments were received before the July 18 meeting. The second series of comments were made during the actual meeting.

The majority of the comments made at the meeting revolved around the proposed specification for compact refrigerators. Organization names are listed in parenthesis next to their comments.

## **PRE-MEETING COMMENTS**

### **Refrigerators:**

- Respond to consumer preference while promoting energy efficiency
- Support regardless of size, type, or defrost as long as it helps attain program goals.

### **Freezers:**

- Manual defrost constitute 50%+ of the market
- Opportunity for significant energy savings
- Any product with FTC Energy Guide should have ENERGY STAR label

### **Compact Refrigerators:**

#### **Cons:**

- Technology not available to meet 20% goal
- Dilutes program and loses credibility due to limited savings on consumer utility bill (annual and lifetime)

#### **Pros:**

- Without label, no incentive for manufacturers to produce or consumers to buy energy efficient product
- Consumers should consider energy efficiency
- Manufacturers would like to promote most efficient products

## **MEETING COMMENTS**

### **Compact Refrigerator Discussion:**

(Comments listed in chronological order)

- Energy savings of a potential ENERGY STAR compact refrigerator would be around 50-72 kWh/year (at 20%). The average ENERGY STAR refrigerator currently saves about 58 kWh/year (at 10%)
- At some point, the law of diminishing returns must be taken into account as the ENERGY STAR criteria expand. Efficiency gains become costly and performance decreases. ([Whirlpool](#))
- If the savings of ENERGY STAR compacts and the benefits to consumers don't add up, the ENERGY STAR brand could be degraded ([Whirlpool](#)).
- A cost effectiveness model for the compact refrigerator market would help clarify certain issues. This should be done now ([AHAM](#))
- Aside from price, there are other ways of determining cost-effectiveness. ([EPA](#))
- There are certain markets where compact refrigerators are being sold in large quantities such as colleges and hotels. Savings could add up with such large sales volumes. ([Absocold](#))

- Annual savings with the proposed 20% spec would be \$5-6 annually. The time to recover the purchase price could be over 20 years. (Whirlpool)
- An important consideration is how long it takes to recover the premium for an ENERGY STAR compact refrigerator instead of the actual purchase price of the product. (Sanyo)
- Dollar savings for compact refrigerators is a larger percentage of purchase price than the dollar savings for a standard sized refrigerator. (Sanyo)
- Compacts are considered by some to be “disposable” products that are price-sensitive (Whirlpool)
- Potential markets for compact refrigerators include the federal government (largest consumer in the world). Government entities such as the GSA need the ENERGY STAR specifications in place as soon as possible in order to begin large purchase orders. (LBL)
- The challenge to manufacture ENERGY STAR labeled compact refrigerators could be beneficial in many ways. The criteria will make more products available. (U-Line)
- The 20% spec needs performance assurance. A testing process could be instituted to confirm efficiency results. (AHAM)
- 20% above minimum federal efficiency standard on compact refrigerators should result in the same savings numbers that come from the 10% above the minimum federal efficiency specification for standard size refrigerators. (Sanyo)
- The life expectancy of a compact refrigerator is 13 years (Sanyo)
- The price point is low enough for compact refrigerators that broken products are replaced instead of fixed. Extending the ENERGY STAR brand to compacts could diminish the general idea of ENERGY STAR (HAIER)
- ENERGY STAR has been successful in many ways over the years. ENERGY STAR is a vehicle to educate consumers about saving energy and buying energy-efficient products. (PECI/NEEA)
- The proposed 20% level for compacts is harder to achieve than the current 10% level is for standard sized refrigerators. There are fewer and more expensive engineering options relative to price. The required investment to achieve the 20% specification could be too high. (Whirlpool)
- Manufacturers are not producing more efficient compacts right now. Without the criteria, there is no incentive. The challenge to make products at the 20% spec could be beneficial, and once the criteria are set, the market will expand. (Sanyo)
- Some consider compact refrigerators to be “throw-away” products. Therefore, people may discredit the label if they see it on such products. (Whirlpool)
- Market transformation issues for compact refrigerators should be a point of interest. Who buys compact refrigerators? How many compacts are sold in a given year? (DOE)
- Some consumers prefer cheaper non-qualifying products as opposed to more expensive ENERGY STAR products. (HAIER)
- Incentives in the compact refrigerator market are a possibility. Examples are promotions from utilities. (CEE)
- Manufacturers that produce high-end compact refrigerators see a potential for the ENERGY STAR label on compacts. They are willing to make the investment for better technology. Dealers can market these products and consumers will buy them. (U-Line)
- Some residences (high end) have 3-4 compact refrigerators distributed throughout their household (U-Line)
- The university market could be a large market for partial defrost compact refrigerators (Absocold)
- ENERGY STAR is a voluntary program. If manufacturers feel they can, then they will make the investment to produce compacts at the proposed ENERGY STAR specification. (U-Line)
- Current DOE definition of compact refrigerator is 7.75 cubic feet and less than 36 inches. Products with low volumes that are greater than 7.75 cubic feet with heights greater than 36 inches will have a difficult time meeting the 20% spec. (Sanyo)
- Where is the best place for the DOE to put its resources given the costs to operate the ENERGY STAR program? (GE Appliances)
- Using the ENERGY STAR brand in products that are not substantial could dilute the label. (GE Appliances)
- Perhaps the goal should be to place the ENERGY STAR label on products with greater payback. The benefits for a standard size top-mount refrigerator are comparatively low (GE Appliances)
- Smaller manufacturers should not be excluded from getting the label on their products just because larger manufacturers don't make those products. (LBL)

- The goal should be to protect the ENERGY STAR brand. Doing this adds value to the entire line of products that are associated with the brand. ([GE Appliances](#))
- The ENERGY STAR label implicitly promises benefits and it should deliver. The savings for a potential ENERGY STAR compact refrigerator will be so low that it is almost misinformation to tell consumers they will save. ([GE Appliances](#))
- ENERGY STAR is needed in order to educate consumers to buy energy efficient products. ([Sanyo](#))
- Beyond the early adjustment period, the ENERGY STAR label on compact refrigerators will make more products available and increase consumer awareness for energy efficiency ([Absocold](#))