



Alliance Laundry Systems LLC
Shepard Street, P.O. Box 990
Ripon, WI 54971-0990
Tel 920.748.3121
Fax 920.748.4429
www.comlaundry.com

October 15, 2004

Mr. Richard H. Karney, P.E.
US Department of Energy
Forrestal Building
1000 Independence Avenue, SW
Washington, DC 20585 - 0121

Dear Mr. Karney:

Subject: **Manufacturer Comments - ENERGY STAR[®] Clothes Washer Criteria For 2007**

Pursuant to the August 31, 2004 stakeholder meeting and your request for comments, the following are our comments regarding 2007 year ENERGY STAR[®] minimum criteria.

- 1.) We support ENERGY STAR[®] administration of any effort of the government to create a water labeling or water reduction incentive program for clothes washers. ENERGY STAR[®] has the experience, resources, website and consumer identity recognition, which EPA does not.
- 2.) Energy (MEF) criteria and possible water factor (WF) criteria should be set at a level that consumer preferred top loaders can achieve.
 - a.) The country's national energy consumption and water consumption will be more positively impacted by establishing qualification levels that move the largest number of purchases of clothes washers to lower energy and water usage models. Consumers still prefer by a wide margin the benefits of economical top loaders, and it would make most sense for ENERGY STAR[®] to set a qualification level that includes top loaders and will spur consumers into early-retirement of their existing less-efficient washers.
 - b.) Setting a level that only front loaders can achieve does not recognize the investments, and initiative taken by US manufacturers to develop and introduce to the market new lower energy and water usage top loaders. Each major redesign by manufacturers creates an opportunity for the US manufacturers to re-consider locating their manufacturing site outside the USA and reducing the number of US employees. This should not be an unanticipated result of ENERGY STAR[®] setting a "front-load-only" incentive qualification level.
- 3.) We recommend ENERGY STAR[®] split the requirements into two of the classes defined for clothes washers.... "top load clothes washers" and "front load clothes washers." Each class must have their own unique qualification level. The rationale for two requirements is as follows:
 - a.) It moves the most quantity of new washer purchases to lower energy & water usage models by allowing top loaders their own qualification level above the 2007 DOE minimum standard.
 - b.) It allows ENERGY STAR[®] partners the ability to assign larger rebates for higher efficiency front loaders.
- 4.) We recommend ENERGY STAR[®] create 2007 levels as follows:

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|-----------------------------|---|---|
| Top Load Clothes Washers: | MEF \geq 1.42 ft ³ /kWh/cycle | WF \leq 10.5 gallons/ft ³ |
| Rationale: | MEF is 17% above minimum standard. | Prior 2004 E-Star models exhibit WF=10.4. |
| Front Load Clothes Washers: | MEF \geq 1.80 ft ³ /kWh/cycle | WF \leq 6.5 gallons/ft ³ |
| Rationale: | MEF is consistent with the advocate's recommendation at the stakeholder meeting. WF is largely consistent with advocate's recommendation of WF \leq 6.0, but allows for helping reduce manufacturer concerns of consumer complaints of wash and rinse performance at low water consumption levels. | |

Sincerely.

Phil Manthei
Sr. Staff Engineer, Agency/Codes Approval

Cc: T. L'Esperance, CEO & President
J. Brothers, VP Sales
S. Spiller - Counsel
S. Gaster, VP Operations