To the responsible for Specification of Energy Star Commercial Clothes Washer

This, so called clarification, really chocked us at Electrolux Laundry Systems.

We have already, as informed by my mail sent to Ryan Fogle, put a lot of effort and cost to Energy Star label machines up to 10,6 cubic feet. It surprises me if the rules could be changed that quick when it already has been announced and official already May 2, 2012.

The best way to solve the problem would have been to extend the container volumes included in Appendix J1 Table 5.1 of the DOE clothes washer test procedure. Not by suddenly adding an unrealistic small upper limit of drum volumes in the specification, especially as you thereby not cover, still quite common, machines for Coin operated laundries and other commercial laundries, exactly what is intended to be covered.

I will give you some more background and also our point of view.

We are manufacturer of Professional Laundry Equipment with very much focus on low water and energy consumption and have Energy Star labelled Commercial washers since many years. We are also Energy Star Partner.

During the consultation of interested parties

of revision 6, we argued for taking away the drum size limits to make the Energy Star label even more useful for different laundries with the purpose to reduce energy. This is also based on our experience that the coin-market ask for bigger machines nowadays.

The latest (Energy Star v6.0) specification defines Commercial Clothes Washer as below:

Soft mounted front loading or top loading Clothes Washer that is defined for use in:

- Applications in which the occupants of more than one household will be using the clothes washer, such as multi-family housing common areas and coin laundries;
- Other commercial applications.

First of all Coin Operated Washers is definitely included as it is already mentioned. Secondly also other commercial laundry washing machines, what we very often call OPL (On Premises Laundry) machines could be included, such as laundries in hotel, gym health care etc. In principle we see no difference for the most applications when we come to 'other commercial applications'.

For Coin Laundries our biggest soft mounted washer is 10,6 cubic feet (300 litre). For other applications the size of our biggest soft mounted washer is 39 cubic feet (1100 litre).

Off course certain limits could be good to make tests realistic. I would therefore suggest that you solve the problem according to below

- Add in the specification the upper limit of container volume to 12 cubic feet.
- Complement the container volumes included in Appendix J1 Table 5.1 of the DOE clothes washer test procedure also to 12 cubic feet.

To do like this it should be more in line with your own interest and statement 'helping to save money and protect the environment through energy efficient products and practices' (copied from your web-site). If you for some reason should have problem to go all the way up to 12 cubic feet, even a smaller increase is

better then 6 cubic feet. As also have been mentioned in DOE document, waivers for large-capacity clothes washers could bridge while standards are up-dated.

I am also involved in the work with a new Cenelec standard for performance measurement of professional washer, and we have no plans and reasons to limit to such small drum volumes.

I hope this summaries clearly our point of view and that you, by quick reaction, can correct the mistake and thereby facilitate for all parties involved to make it possible to Energy Star Label also bigger washers for the sake of environment and sustainability.

If it should be to some more help we are of course also positive to have a telephone meeting, for clarifications and for speeding up this case.

Best Regards

Lars Örnholmer
Manager Engineering R&D