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Via E-Mail

Ann Bailey  
Director, ENERGY STAR Product Labeling  
U.S. Environmental Protection Agency  
mostefficient@energystar.gov

Re: Most Efficient of ENERGY STAR Proposed Eligibility for Recognition, Refrigerator-Freezers and Clothes Washers

Dear Ms. Bailey:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the Most Efficient of ENERGY STAR's Proposed Eligibility for Recognition, Refrigerator-Freezers and Clothes Washers.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances are also a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement. AHAM's members have demonstrated their continuous commitment to bringing the most efficient products possible to market. We continue to believe, however, that the impact of the "Most Efficient" program within the ENERGY STAR program must be carefully considered. There are issues with respect to refrigerator-freezers, detailed below, that require further consideration and resolution.

First, the product classifications used in the recognition criteria for refrigerator-freezers should be exactly consistent with the most recent version of DOE's regulation (10 CFR 430.32), including any clarifications in the agency's recently promulgated Final Rule (76 Fed. Reg. 57516) that are applicable. By citing DOE's regulations there will be no confusion over which

products are included or not included, such as all-refrigerators, basic refrigerators, automatic or manual defrost products.

AHAM further believes that there is an unintended consequence as a result of the criteria proposed for refrigerator-freezers. EPA's proposed recognition criteria for refrigerator-freezers will make it extremely challenging for and penalize products with through-the-door ice to obtain the Most Efficient designation. Refrigerator-freezers with through-the-door ice have a higher measured energy under the DOE test procedure than products without that feature because, due to their design, they have a higher heat leak. And the impact of that heat leak on measured energy is greater under the test conditions than it is in the field due to differences in ambient temperature (90 degrees Fahrenheit under the test procedure as compared to an estimated average of about 70 to 75 degrees Fahrenheit in a consumer's home). Furthermore, it has long been industry's position that in practice, refrigerator-freezers with through-the-door ice (and water) make it so that consumers open the refrigerator or freezer door less frequently. This difference between products with and without through-the-door ice is not accounted for in the refrigerator/freezer test procedure, which is a closed door test, meaning that it does not incorporate door openings. Door openings contribute significantly to energy use in the home. DOE's energy efficiency standards for refrigerator-freezers recognize these design differences and test procedure limitations through less stringent standards for products with through-the-door ice than for products without that feature. EPA should encourage consumers to open and close the refrigerator or freezer door less frequently because that behavior ultimately uses less energy. Accordingly, EPA should set eligibility recognition levels for refrigerator-freezers with through-the-door ice that are achievable so that those products may be designated as Most Efficient.

In addition to these *de facto* exclusions from Most Efficient of Energy Star, the program specifically excludes all-refrigerators and freezers. There is no justification for this exclusion.

Finally, similar to the criteria that exclude certain refrigerator-freezers, the recognition criteria for clothes washers also exclude certain products by default. EPA's Modified Energy Factor and Water Factor levels preclude high-efficiency top load washers from the Most Efficient program.

AHAM appreciates the opportunity to submit these comments on the proposed ENERGY STAR Most Efficient Eligibility Recognition Criteria. We would be glad to discuss this matter further should you request.

Best Regards,



Kevin Messner  
Vice President, Policy & Government Relations