

**Responses to Comments on ENERGY STAR® Most Efficient 2013 Proposed Recognition Criteria**

<b>Appliances</b>	
<b>Stakeholder Comments Summary</b>	<b>U.S. Environmental Protection Agency (EPA) Response</b>
<p>One stakeholder expressed support for maintaining the Most Efficient 2012 refrigerator/freezer criteria for Most Efficient 2013 given the relatively low number of products that have been recognized as ENERGY STAR Most Efficient in 2012.</p>	<p>EPA has retained the proposed refrigerator-freezer criteria for Most Efficient 2013.</p>
<p>One stakeholder suggested that EPA obtain market share data and increase in maximum efficiency available for clothes washers. From the scatter plot of ENERGY STAR qualified models on slide 13 of EPA's September 12, 2012 Draft 1 V7.0 specification webinar, it appears that there are several models that have just met either the Most Efficient MEF or WF, indicating that manufacturers either added new models that met the Most Efficient 2012 criteria or redesigned existing models to meet the criteria. While this shift may justify an increase in the Most Efficient criteria, the stakeholder is not comfortable with supporting the increase without unit shipment market share data, especially for a small increase in the Most Efficient 2013 efficiency criteria. Basing an update of Most Efficient criteria solely on market availability may discourage manufacturers in the future from designing to the Most Efficient specification, for the fear that it will be updated immediately due to too many available models. The stakeholder commented that if the market share has increased substantially or there has been an increase in maximum efficiency available (or a substantial increase in the number of models available beyond the current ENERGY STAR specification) it would likely justify updated Most Efficient criteria.</p>	<p>EPA does not have comprehensive shipment data or market share information for clothes washer models that meet the Most Efficient eligibility requirements. However, given that the number of clothes washers recognized in the Most Efficient 2012 pilot program has more than doubled in the last year to over 60 models, EPA continues to believe more aggressive Most Efficient criteria are warranted for clothes washers (&gt; 2.5 cu-ft.) in 2013 to be truly reflective of the "best-of-the-best" of ENERGY STAR.</p>
<p>One stakeholder commented that the proposed Most Efficient 2013 clothes washer levels continue to exclude the most popular product configurations like top-load clothes washers.</p>	<p>EPA's recognition principles for the Most Efficient program have guided product category selection and criteria development to help ensure the program highlights products with truly exceptional energy efficiency performance. As part of those principles, EPA noted it was not the goal of the Most Efficient program to ensure that there were qualifying models in all sizes or configurations. Consistent with this, EPA's criteria for clothes washers recognize the most efficient models on the market, irrespective of loading configuration.</p>