

October 12, 2012

Via E-Mail

U.S. Environmental Protection Agency  
ENERGY STAR Most Efficient Program  
[mostefficient@energystar.gov](mailto:mostefficient@energystar.gov)

Re: ENERGY STAR Most Efficient Pilot Program Evaluation

On behalf of GE Appliances, thank you for the opportunity to provide comment on the propose ENERGY STAR Most Efficient 2013 Recognition Criteria and Pilot Program Evaluation.

GE Appliances continues to be concerned that the Most Efficient Program will dilute the ENERGY STAR brand, and otherwise serve to undermine the investment that manufacturers like GE have made in developing and promoting ENERGY STAR products generally. The pilot evaluation as described by EPA seems to have primarily targeted the limited number of existing program participants, and has not provided meaningful evidence to date of the effectiveness of the program in providing value to consumers, utilities, and other stakeholders of the program. Ultimately, we believe that a robust justification for the program will be necessary to justify the value and effectiveness of the program to consumers and utilities, and to demonstrate a value in participating to manufacturer and retailer partners. Until that time, designation as a program participant should not be automatic, and, rather, stakeholder partners should be able to elect whether program participation (even if they have qualified products) is worthwhile. Once the program is shown to provide value to consumers and other stakeholders, participation will likely increase, but, until that time, the designation should be voluntary.

Sincerely,

Kelley Kline

Global Product Stewardship Program Manager, GE Appliances