



GE Appliances & Lighting

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Via e-mail to: mostefficient@energystar.gov

Ms. Ann Bailey
Director, ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: ENERGY STAR Most Efficient 2012 - Proposed Eligibility for Recognition

Dear Ms. Bailey:

GE Appliances ("GE") is pleased to submit these comments regarding the Environmental Protection Agency's ("EPA" or the "Agency") ENERGY STAR Most Efficient 2012 - Proposed Eligibility for Recognition. GE has a long history of innovation and development of energy efficient products and is a multi-year recipient of ENERGY STAR Sustained Excellence awards.

GE reiterates its concern that the Most Efficient designation will dilute the ENERGY STAR brand. Regulators, manufacturers, retailers and consumers have all devoted substantial time, money and effort toward the promotion and adoption of the ENERGY STAR program. ENERGY STAR has become a recognized brand among consumers, giving them confidence that the qualified appliances they buy will operate efficiently and cost-effectively. GE is concerned that the Most Efficient designation may cause confusion among consumers and lead them to believe that the ENERGY STAR designation has either been supplanted or is somehow less valuable than before.

To that end, GE believes that EPA should continue to study the effectiveness of the Most Effective pilot program in delivering energy savings and value to consumers. To justify the continuation of this program, EPA should provide demonstrable evidence that the benefits outweigh the concerns noted above. EPA should also keep participation in this program voluntary and not provide for automatic product designation, as, depending on the observed utility of the pilot program, manufacturers may elect whether or not to participate.

For the foregoing reasons, GE urges EPA to proceed carefully in implementing Most Efficient criteria so as not to undercut or dilute the value of the ENERGY STAR brand and the success of the ENERGY STAR program. Furthermore, EPA should evaluate the program against these concerns and keep participation in the program voluntary.

Please let me know if you have any questions or would like any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Baker", with a stylized, cursive script.

David N. Baker
Counsel, Government Relations
& Regulatory Compliance
GE Appliances & Lighting