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December 15, 2011

Via Email

Ann Bailey
U.S. Environmental Protection Agency
ENERGY STAR® Appliance Program
mostefficient@energystar.gov

Re: ENERGY STAR's Most Efficient: Proposed 2012 Recognition Criteria

Dear Ms. Bailey:

Whirlpool Corporation appreciates the opportunity to comment on this proposal. Our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise continues to be a strong source of pride for our company.

The serious concerns we have with the "Most Efficient" ENERGY STAR Pilot Program were outlined in our comments on April 6, 2011. Due to the fact these reservations were not addressed within the final requirements of the recognition criteria, Whirlpool Corporation elected not to participate in the 2011 "pilot". We will continue to do so in 2012 should the EPA continue to maintain the same basic scope and, to a large degree, the requirements of the 2011 pilot for 2012. To reiterate our reservations and concerns, we would again like to emphasize the following:

- 1) The proposed program is not in line with the fundamental ENERGY STAR guiding principle of "making it easy for consumers to identify and purchase energy-efficient products that offer savings on energy bills without sacrificing performance, features, and comfort".
- 2) It does not have separate criteria for the different classes of products such as refrigerators with through-the-door ice or high-efficiency top load clothes washers.
- 3) Before a large marketing investment can be made nationwide, more consumer research and/or a smaller scale pilot is needed to better understand whether or not the ENERGY STAR brand we have all worked so hard to build, will be diluted.
- 4) There is confusion in the market place on the difference between CEE Tier levels and "Most Efficient".

Additionally, as a very active member of the Association of Home Appliance Manufacturers (AHAM), we have worked closely with them in the development of the comments they have submitted (under separate cover) regarding this matter. Please be advised that we support and echo the positions taken by AHAM. It is important to note that given their position as an industry organization, AHAM cannot offer comments either for or against the "Most Efficient" proposal. Their response only refutes the details of the program as proposed.

Thank you again for your consideration and we look forward to continued collaboration with ENERGY STAR going forward.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nick Gillespie", written in a cursive style.

Nick Gillespie
Government Relations Senior Specialist