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October 12, 2012

Via Email

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

Re: ENERGY STAR's Most Efficient Proposed 2013 Recognition Criteria

Dear Ms. Bailey:

Thank you for the opportunity to comment on the latest Most Efficient proposal.

The serious concerns we have with the “Most Efficient” ENERGY STAR Program were outlined in our comments to EPA on April 6, 2011 and December 15, 2011. Due to the fact these reservations were not addressed within the final requirements of the last two recognition criteria’s, Whirlpool Corporation elected not to participate in the 2011 and 2012 program. For 2013, many of those same concerns remain and while the evaluation report on the Most Efficient website has some interesting insights, it uses a very limited set of active participants (i.e. utilities, retailers and manufacturers) and rebate programs as evidence of a worthwhile initiative. Moreover, the proposed levels continue to exclude the most popular product configurations like top load clothes washers. As such, we cannot support the Most Efficient 2013 program as proposed at this time, but will continue to stay informed by monitoring all relevant sources of data in our ongoing evaluations of the program.

As we have said many times, our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise is a strong source of pride for our company. Thank you again for your consideration and please be sure to contact me with any follow up questions or comments.

Respectfully,

Nick Gillespie

A handwritten signature in cursive script that reads "Nick Gillespie".

Nick Gillespie
Government Relations Manager