



GE Consumer & Industrial

Kelley A. Kline
Compliance Counsel

Appliance Park, AP2-225
Louisville, KY 40225
USA

T 502 452 7603
F 502 452 0347
Kelley.Kline@ge.com

April 30, 2010

Kathleen Vokes
Energy Star Product Development
Environmental Protection Agency
1310 L Street, NW
Washington, DC 20005

Dear Ms. Vokes:

Re: GE Appliances & Lighting Comments on the Energy Star Product Enhanced Testing and Verification Proposal for Appliances

On behalf of GE Appliances & Lighting, I would like to provide our comments to the Environmental Protection Agency (EPA) Energy Star Program on its proposal for Energy Star Products Enhanced Testing and Verification. GE Appliances & Lighting has had a long commitment to energy efficiency, including the manufacture of energy efficient appliances, as evidenced by receipt this year of ENERGY STAR's Sustained Excellence award for the fifth straight year. As such we have a strong commitment to the value of the ENERGY STAR brand, and offer these comments to you for your consideration.

GE Appliances & Lighting hereby adopts by reference the comments submitted by the Association of Home Appliance Manufacturers (AHAM) and the National Electrical Manufacturers Association (NEMA) and supplements them in the following respects.

Product Qualification/Certification

GE fully supports product pre-qualification testing. We do, however, have significant concerns that a third-party laboratory requirement for product qualification testing will create issues with cost and time-to-market that would outweigh any benefits of such an approach. Our experience tells us that there are not enough accredited laboratories to handle energy performance testing of all new products. For instance, with room air conditioners, GE currently requires new suppliers to calibrate their laboratories with AHAM and AHRI's certification. The backlog in these labs can be up to four months long. Adding the additional burden of certifying all new products would result in an insurmountable backlog of test units.

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But even assuming there was capacity to handle testing of all new units, such testing would add significantly to product cost and time-to-market. We believe that the same goal of having pre-qualification testing, and providing EPA access to test results can be realized by in-house labs such as those certified by the Standards Council of Canada. The CSA certification process reduces testing and personnel costs while not sacrificing testing rigor and time-to-market. Absent a compelling reason why certified manufacturer labs should not perform pre-qualification testing, EPA should accept results from such manufacturer labs.

Product Verification

GE supports the EPA's effort to confirm the validity of Energy Star claims, to ensure that all products on the market meet the Energy Star product criteria. We are concerned, however, that in selecting higher percentages of product for verification testing (i.e. 30% per year), EPA will duplicate pre-quality control testing and add substantial cost for little benefit. We recommend that EPA support third-party administered programs such as AHAM's for room air conditioners and dehumidifiers and the refrigeration program under development. EPA should be consulted as verification goals are developed, but EPA should not establish an arbitrary threshold for products because there are important market and risk differences between product lines. As discussed further below, we strongly encourage EPA to rely on programs such as AHAM's that contain realistic operating principles and procedures and provide compliance assurance.

Test Procedure Variability

One important consideration for EPA is the inherent variability of the test parameters that naturally causes variation in certain efficiency measurements. Using the example of room air conditioners, the International Journal of Refrigeration studied the effect these variables had on cooling capacity, which directly corresponds to efficiency, in a 2009 article entitled *Methodology for uncertainty calculation of net total cooling effect estimation for rating room air conditioners and packaged terminal air conditioners*. They analyzed the allowed variability of the test parameters and determined the uncertainty at the 95% confidence level was +/- 3.4%. This means that two different labs testing the same unit according to the standard could get results that vary by 6.8%. For years AHAM has been conducting random audits of certified products. Products selected for this audit have been allowed to be up to 5% below the rated value on the appliance. EPA should recognize these inherent variations, and provide guidance explaining its approach and/or a tolerance (e.g. 5%) to account for test lab variability.

AHAM Programs

Both dehumidifiers and room air conditioners are currently certified by AHAM. To reduce testing costs and the burden on third-party laboratories it is recommended that EPA rely on these existing programs to the maximum extent practicable, as we believe they realize the goals of EPA's Enhanced Testing and Verification program.

Request for Additional Guidance

Finally, as EPA finalizes its enhanced testing and verification procedures, we ask that EPA provide guidance on its implementation of the program, including how these proposed new requirements will dovetail with existing DOE and FTC reporting and other requirements. Specifically, EPA should address such questions as how manufacturer specific testing data (aside from the test results) will be kept confidential, what tolerance is acceptable between test report values and FTC labels that fairly

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represent energy use, and the types of test report forms and templates that EPA will require for product submissions. EPA should also consider what incentives, if any, it will implement to encourage voluntary disclosure of problems that manufacturers may identify through internal audit programs and the guidelines for making such disclosures.

GE Appliances & Lighting continues to be a strong supporter of EPA's efforts to improve the efficiency of the nation's appliances. Please feel free to contact me at (502) 452-7603 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Kelley Kline". The signature is written in black ink and is positioned above the printed name.

Kelley Kline