

Fisher & Paykel Appliances

Comment on Energy Star Proposals - adding Water Factor.

General

Fisher & Paykel Appliances is a home appliance manufacturer with production facilities in New Zealand Australia and the US. Our main markets for clothes washers are New Zealand, Australia and the US. We have marketed clothes washers with Energy Star for 5-6 years. Fisher & Paykel Appliances has always been a strong supporter of such premium schemes that reward technical excellence.

Fisher & Paykel Appliances agrees with adding Water Factor for future Energy Star qualification criteria. We feel Water Factor is an appropriate addition to the criteria. For public understanding of these technical issues it is important that there is not a proliferation of award schemes. To prevent such a proliferation occurring, existing schemes must develop comprehensive criteria covering a number of issues. To have separate schemes for water and energy would dilute the effect of each of them. It is also appropriate that criteria for Energy Star and the CEE scheme are aligned. This assists with the public understanding and appreciation of the award schemes.

Water Factor.

Fisher & Paykel Appliances agrees with the proposed Energy Star 2007 limits of WF = 7.5 and MEF = 1.8. We see these as sufficiently tough limits that will make the scheme worthwhile and meaningful. We also feel that these are achievable limits by a significant number of models including some vertical axis washers. Note that Fisher & Paykel washers do not meet this WF requirement and considerable work is required to achieve it. But without such a limit the scheme becomes 'soft' and meaningless. The target date of 2007 is also appropriate to align with the federal standard for MEF changing.

Performance

Washer performance is an issue of concern. We are aware that DOE has never included performance in its test standards. To include them is a difficult task. However we must caution that performance can be severely compromised in the pursuit of lowering water consumption. We have experience of this in Australia where some water utilities have offered very significant rebates to purchasers of water efficient appliances. In order to have qualifying product some suppliers have merely reduced the rinsing performance of the washer either by reducing the volume of water used or changing rinse cycles. There is no measure of rinse performance in the test standard and so some washers are tested on cycles that would never be used by consumers. Hence the water savings as tested are not real and proposed reduction in total water consumption would not be achieved in reality.

In Australia, technical work to develop a test procedure is well advanced. Australia is proposing to introduce mandatory rinse testing by the end of 2005. Also the IEC International Standards Committee has begun work for an international test. We acknowledge that rinse performance is a difficult issue but would plead that it be seriously considered. The 2007 introduction date allows time for this and it would prevent some washers having grossly inadequate rinse performance being introduced to the market.

DOE Waiver Process.

Recently Fisher & Paykel obtained a waiver from DOE for a model of clothes washer. This was a very protracted procedure. Both the need to disclose the innovation publicly, and the long and uncertain time taken, makes it very difficult to use innovation to meet critical deadlines. It will be very unfortunate if companies wishing to implement some new ideas, find the App J1 test procedure is unusable and then are forced to seek a waiver.

We believe that DOE needs to radically exam this process and make it much more 'user friendly'. This would make it useable by companies wishing to innovate, but obviously needing to keep that innovation confidential.

Summary.

Fisher & Paykel Appliances

- Supports the proposal for $WF = 7.5$ and $MEF = 1.8$
- Agrees with the 2007 date.
- Agrees with the proposed WF alignment for the CEE scheme.
- Cautions on the adverse effect of ignoring rinse performance when reducing water consumption.
- Proposes that DOE exam its waiver procedure to make it more able to be used by companies introducing innovation.

Please do not hesitate to contact us if you require any more information.

Richard Bollard
Fisher & Paykel Appliances,
Richard.Bollard@fp.co.nz

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