



**Comments of the Procter and Gamble Corporation Regarding Energy Star Criteria for 2007
Clothes Washers**

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Procter and Gamble, global manufacturer of laundry and dish products that are typically added to clothes washers and dishwashers, appreciates the opportunity to comment on Energy Star criteria for clothes washers for January 2007. Like other stakeholders for the residential appliances energy saving programs, the Procter and Gamble Company fully supports said programs in North America.

Background:

Procter and Gamble feels it is important to comment on the proposed changes to appliances as these directly affect the consumer satisfaction of the laundry process. Performance and thus consumer satisfaction are linked to the wash system, which includes contributions from the appliance and the additives (detergents and softeners), and to the way that the consumer uses them (consumer habits). Only if performance expectations are met by the consumer will she experience the energy and water savings that were intended.

Energy Star Criteria for Clothes Washers for 2007

Procter and Gamble supports the Energy Star criteria for clothes washers (MEF 1.72 and WF 8.0) since clothes washers that meet these criteria today deliver excellent stain removal performance. This performance is at least equal to that of a toploading/agitator system and lends itself to achieving significant energy and water savings. The proposed criteria of MEF=1.72 and WF=8.0 equates the Energy Star clothes washers of 2007 with the low wash (as opposed to rinse) water systems of 2005. Low wash water systems include most if not all of the frontloading washers sold in North America today and only those toploading washers that do not have a center post agitator. If these criteria are attempted to be met with toploading agitator washers, which may require a reduction in rinse water volume, the performance along various vectors may drop and may thus become a case where neither performance nor energy/water savings are attained (see comments by P&G to Energy Star in October 2004).

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