

11/26/2004

**Steering Committee for Water Efficient Products  
1001 Connecticut Ave., NW Suite 801  
Washington, DC 20036**

Supplemental Comments to the Department of Energy  
Proposed Revisions to the Energy Star Clothes Washer Program

Recommendations:

1. The Energy Star eligibility criteria for clothes washers should be revised for 2007, and criteria for residential washers and for family-sized commercial washers should be equivalent, as they are today.
2. The revised eligibility criteria for Energy Star clothes washers in 2007 should include both a modified energy factor (MEF) and a water factor (WF), an action that will induce many of the nation's drinking water utilities to become new Energy Star Partners.
3. Eligibility criteria for both water and energy efficiency should be set at levels of performance that will maintain the identification of Energy Star with high efficiency. DOE should not be overly accommodative to lesser-performing products or technologies. Criteria that can be met today by multiple manufacturers and by 15 to 20 percent of total clothes washer sales would appear to be adequate in this regard.
4. Important labeling issues remain to be addressed. After establishing the revised performance criteria for 2007, DOE should move to a second stage of public notice and comment to address the appropriate marking and labeling requirements for conveying both the energy and water efficiency of qualifying products. These requirements should be developed in close coordination with the water-efficient product labeling program of the Environmental Protection Agency.