LG ELECTRONICS USA, INC.

1000 Sylvan Avenue
Englewood Cliffs, NJ 07632

August 29, 2011

Ms. Amanda Stevens
Product Manager
ENERGY STAR Appliance Program
U.S. Environmental Protection Agency
Washington, DC 20460
appliances@energystar.gov

Re: ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Draft 1, Version 6.0 (Commercial Clothes Washers)

Dear Ms. Stevens:

On behalf of the LG Electronics USA, I am pleased to provide our comments on the ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Draft 1, Version 6.0 (Commercial Clothes Washers).

LG Electronics USA, Inc., based in Englewood Cliffs, N.J., is the North American subsidiary of LG Electronics, Inc., a $48 billion global technology leader in home appliances, consumer electronics and mobile communications. LG Electronics is committed to being an industry leader in developing green innovations and working collaboratively with the Environmental Protection Agency and Department of Energy in our environmental efforts, led by our strong commitment to ENERGY STAR®. We appreciate the opportunity to continue partnering with the ENERGY STAR® program, as it pertains to commercial clothes washers.

In the United States, LG Electronics sells a range of innovative products, including commercial clothes washers. LG is proud to offer hundreds of ENERGY STAR-qualified models -- from TVs and refrigerators to washing machines and room air conditioners. In fact, eight LED HDTVs, five washing machines and two refrigerators manufactured by LG have earned the distinction of "ENERGY STAR® Most Efficient," an important enhancement to the ENERGY STAR® program that LG has supported from the beginning.

Building on its position as the leading brand in the United States in the front-load ENERGY STAR® residential laundry category, LG has taken its home appliance platform to new heights in a heavy-duty line-up of popular commercial-grade machines.

LG's commercial washers incorporate an array of energy and water efficiency features that helped them achieve ENERGY STAR® qualifications. At the heart of LG's energy efficiency is our exclusive inverter control, direct-drive motor system, which allows the drum to run at a constant speed, reducing wasted energy from continuous speed fluctuation. This system also allows the washer's drum to reach high spinning speeds or revolutions per minute (rpm). With these faster and more frequent spins, clothes are dryer when they come out of the washer, and therefore require less time in the actual dryer, saving on energy usage and costs. Even some of the most efficient commercial washers operate at 1000 rpm; LG's operates at 1150 rpm.

While typical washers have horizontal drums, the drum in LG's washers is tilted at a 10 degree angle, requiring less water to fill the back cavity where clothes are being cleaned. In fact, the average similarly sized commercial washer uses 16 gallons per load, but this system allows LG's to only use 11 gallons per load.

With these features, LG's commercial washers meet the Consortium for Energy Efficiency (CEE) Tier 3 requirements, which recognize the most energy efficient commercial laundry machines in the market. CEE specifications are determined using a combination of the Modified Energy Factor (MEF), energy consumption based on how many cubic feet of laundry can be washed and dried with one kilowatt hour (kWh) of electricity, and Water Factor (WF), the number of gallons needed for each cubic foot of laundry. LG's machines go beyond set specifications for both metrics.

LG believes the ENERGY STAR® rating is every bit as important in commercial laundry. LG ENERGY STAR® commercial clothes washers are currently deployed primarily in multi-family dwellings and on campuses across the country. In fact, out of the 100 top "Green Colleges," as selected by the U.S. Green Building Council and the Princeton Review, more than 30 percent of them already use LG commercial laundry systems. The ENERGY STAR® brand tells facility operators and property owners that they are installing efficient machines that will save them money and, equally important, help reduce greenhouse gas emissions. Consumers using our machines in these commercial installations, of course, also have a sense of pride and well-being because of their familiarity with and confidence in the ENERGY STAR® label.

Given the significant energy and water savings achieved with our commercial clothes washers, LG has a substantial interest in ensuring the ENERGY STAR® label continues to identify the top performing products in the category. With that in mind, LG offers the below feedback on the proposed Product Specification.

1. Revise the Definition of Commercial Clothes Washers to Include Larger Capacity.

In the Draft 1 Version 6.0 product specification, EPA proposes to harmonize the ENERGY STAR® definition of commercial clothes washer with the DOE definition for appliance standards. In general, LG supports efforts to reduce confusion and create consistency for manufacturers between the two programs. In this case, however, the proposed change would create a market bias toward smaller capacity units, meaning more loads, more energy and water consumed. LG recommends that EPA modify the definition used by DOE to allow horizontal-axis clothes washers with a capacity larger than 3.5 cubic feet to be eligible for the ENERGY STAR® label.

LG realizes that the universe of products that could be included in the term "commercial clothes washers" is quite large, including some units that are more akin to an industrial product than a commercial product. For the purposes of these comments, LG is referring to commercial clothes washers that have characteristics and platforms similar to residential washers, but with larger capacity.

If the ENERGY STAR® specification for commercial clothes washers is revised to adopt the DOE definition without modification, a number of highly efficient commercial washers will be excluded, including some manufactured by LG. This risks creating customer confusion and undermining confidence in the brand, as the ENERGY STAR® label would no longer identify the most efficient commercial clothes washers. The specification should ensure that all products properly within a category are eligible for the ENERGY STAR® label, so that consumers are able to compare products appropriately.

Indeed, this is the very issue that the DOE recognized when granting LG a waiver from the test procedure used for both residential and commercial clothes washers. In granting the waiver, DOE stated "it is in the public interest to have similar products tested and rated for energy consumption on a comparable basis." 76 Fed. Reg. 218879, 21880 (April 19, 2011). Further, on August 9, 2011, DOE released a supplemental notice of proposed rulemaking, proposing a number of amendments to the clothes washer test procedure. 76 Fed. Reg. 49238. Among those amendments is a proposal to allow testing of container volumes up to 6.0 cubic feet. Whether from the waiver or the proposed rule change, there will be a test procedure in place to allow higher capacity washers to be tested, reducing concerns about verification and enforcement.

Commercial clothes washers that have characteristics similar to residential clothes washers should be included within the ENERGY STAR® specification to ensure that the most efficient products on the market carry the ENERGY STAR® label.

2. <u>Performance metrics in the qualification criteria unnecessary.</u>

In the draft specifications, EPA also seeks comment on whether the commercial clothes washer specification should include performance criteria, such as cleaning or rinse performance. LG believes that modification to be unnecessary at this time.

The marketplace for commercial clothes washers is very competitive, and LG is committed to identifying and meeting customer needs. Performance is a central demand of our customers, and the competitive marketplace ensures that we, and other manufacturers, are constantly striving to improve performance. An ENERGY STAR® criterion would not likely modify any manufacturer's prioritization of performance, and as such, is unnecessary. However, LG would welcome the opportunity to continue working with the ENERGY STAR® program to assess whether such criteria would be useful in the future.

LG appreciates the opportunity to provide these comments on the Product Specification for Clothes Washers, Eligibility Criteria, Draft 1, Version 6.0. Thank you in advance for your consideration. We look forward to continuing to support the ENERGY STAR® program.

Respectfully submitted,

John I. Taylor
Vice President, Government Relations and Communications
LG Electronics USA, Inc.
john.taylor@lge.com