



GE Consumer & Industrial

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Richard Karney
Energy Star Program Manager
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Washington, DC 20585-0121

Non-Confidential Version

Re: Proposed Revisions to ENERGY STAR® Criteria for Refrigerator-freezers

Dear Mr. Karney,

GE submits these comments to supplement the comments filed on June 1 in response to the Department of Energy's ("DOE" or the "Department") proposed revisions (the "Proposal") to the qualification levels for ENERGY STAR refrigerator-freezers.

The discussion at the June 4, 2007, stakeholders' meeting was extremely informative in highlighting the importance of basic platform design to a manufacturer's ability to increase the energy-efficiency of its refrigerators by ~33% to achieve the proposed 20-above-standard qualification level.

The basic energy models of today's refrigerator fleet were introduced as recently as 2000, in anticipation of the 2001 current energy standard or 2003, when the Clean Air Act mandated that HCFC-141b be eliminated as a refrigerant and blowing agent for insulating foam. Investment to achieve compliance with the Department's new energy standard and the EPA's rule under Clean Air Act was, for GE, many hundreds of millions of dollars.

GE and all manufacturers recover these costs by spreading them over the entire refrigerator fleet, which reduces the impact to the individual consumer, who receives the benefit of improved energy performance and lower utility bills.

With the energy performance of the basic “box”—the refrigerator case and door—determined by foam choice, increases in efficiency to comply with higher ENERGY STAR qualification levels can only be obtained by adding ever more efficient components to the unit. And, unlike the basic energy performance that has been designed into the unit, the costs of these added components must be borne only by the consumers who purchase the ENERGY STAR models.

Contrary to the Department’s analysis, these high-efficiency components—compressors, fan motors, condensers, electronic controls, etc.—are not in ready supply. Many must be designed, and all must be tested and qualified for use in the basic energy models.

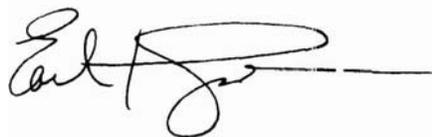
Six manufacturers, including GE¹, urged the Department to delay the effective date for implementing the new qualification level. And, while they proposed effective dates ranging from October 2008 to April 2009, the six came to a consensus recommendation that the Department should adopt April 1, 2009, as the effective date.²

GE files these supplemental comments in support of that consensus.

Conclusion

GE urges DOE to implement the new ENERGY STAR refrigerator qualification level in April 2009. As discussed at the June 4 stakeholders meeting, this date is appropriate for two reasons: (1) more time is needed to develop and qualify higher efficiency components; and (2) an early spring date, the beginning of the refrigeration selling season, best accommodates the needs of retailers.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Earl F. Jones", with a horizontal line extending to the right from the end of the signature.

Earl F. Jones
Senior Counsel

CC: Michael McCabe

¹ Electrolux Home Products, Liebherr, LG, Samsung, Sub-Zero in addition to GE.

² The representative of the seventh manufacturer, Whirlpool Corp., stated at the June 4 meeting that although it preferred the April 1, 2008 effective date, Whirlpool would not object to an April 2009 date. The Consortium for Energy Efficiency representative also accepted the April 2009 effective date based on the manufacturers’ consensus recommendation.