ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

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By E-Mail

Kristen Taddonio
ENERGY STAR for Appliances
U.S. Environmental Protection Agency
Taddonio.kristen@epa.gov

Re: Proposed ENERGY STAR Test Procedures For Combination Washer-Dryers

Dear Ms. Taddonio:

The Association of Home Appliance Manufacturers (AHAM) appreciates this opportunity to comment on two potential test procedures for combination washer-dryers detailed in your letter to ENERGY STAR clothes washer stakeholders dated August 17, 2010.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's more than 150 members employ tens of thousands of people in the U.S. and produce more than 95% of the household appliances shipped for sale within the U.S. The factory shipment value of these products is more than $30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports EPA's efforts to encourage energy efficient appliances. But AHAM has serious concerns about the proposed test procedures. AHAM urges ENERGY STAR to use final, currently effective DOE test procedures for measuring energy consumption. This provides consistency and clarity for the regulated community and ENERGY STAR stakeholders. If ENERGY STAR decides to move forward with this program at this time, it should study consumer use habits, rather than relying on unsupported assumptions.

Proposed Method A would require that the clothes washer energy and water consumption be tested using 10 C.F.R. Subpart B, Appendix J1 and that clothes dryer energy consumption be tested using DOE SNoPR 75 Fed. Reg. 37,594 (June 29, 2010) (hereinafter "SNoPR test procedure"). AHAM opposes reliance on a proposed test procedure for several reasons. First, as

the SNoPR test procedure is currently out for public comment, there may be changes to it when the final rule (hereinafter "final revised test procedure") is published. This could ultimately result in differences in the test procedure for purposes of measuring energy consumption and qualifying for ENERGY STAR. Second, the SNoPR test procedure, once adopted as a final rule (with or without changes), could have changes that impact the energy standard level and would thus, not become effective until the next change in the energy standard level. Accordingly, were ENERGY STAR to adopt it, industry would be required to use two different test procedures until the final revised test procedure became effective.

Having multiple test procedures in use to measure energy consumption will cause confusion not only for manufacturers, but also for consumers. If ENERGY STAR proceeds with developing a program for combination washer-dryers, AHAM urges ENERGY STAR to use the current version of the clothes dryer test procedure and to change to the final revised test procedure, currently in SNoPR form, when it becomes effective.

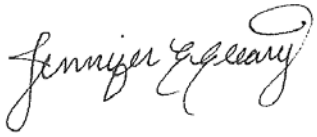
Furthermore, if ENERGY STAR uses the SNoPR test procedure or uses the final revised test procedure prior to it becoming effective, consumers will not easily be able to compare combination washer-dryers to separate washers and dryers in a store because the applicable Federal Trade Commission (FTC) Energy Guide labels will be based on the current test procedure, whereas ENERGY STAR qualification will be based on the not-yet-effective SNoPR or final revised test procedure. For an ENERGY STAR program to be effective, and to avoid consumer confusion, it should correspond with the FTC Energy Guide label.

AHAM notes that it would be less burdensome for industry were ENERGY STAR to adopt already-existing DOE test procedures (and to later change to the final revised test procedures once they become effective). Those procedures are currently in use and are, thus, well-understood by industry. Furthermore, use of the already-existing DOE test procedures would allow for the most effective comparison between combination washer-dryers and separate clothes washers and clothes dryers. If ENERGY STAR decides to use proposed Method A (whether it selects the current test procedure, the SNoPR test procedure, or the final revised test procedure), AHAM requests that it state what the formula would be for combining clothes washer and clothes dryer energy and water consumption into common metrics or units.

In the event ENERGY STAR decides to move forward with this program at this time, AHAM urges ENERGY STAR to study consumer use habits. The current proposals are based on unsupported assumptions about average consumer usage. If the preferable test procedure is to be the one that most accurately reflects consumer usage, then consumer usage must be understood. Furthermore, evidence should be provided to show that the current test procedure needs to be altered, which is what is occurring during the DOE's current rulemaking process.

AHAM appreciates the opportunity to submit these comments. Should you have questions or would like to discuss this further, we would be glad to assist you.

Respectfully submitted,



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