Dear ENERGY STAR Clothes Washer stakeholder,

On May 14, 2010 the Environmental Protection Agency (EPA) informed stakeholders of its intention to discontinue the qualification of combination washer-dryers under the ENERGY STAR residential clothes washer specification. In the absence of an ENERGY STAR performance specification for residential clothes dryers, the Agency concluded it is inappropriate to associate the ENERGY STAR label with all-in-one washer-dryers. In response to stakeholder comment on this issue, EPA decided to go ahead and stop accepting new all-in-one washer-dryer qualifications but provide an opportunity for these models to demonstrate high efficiency performance on a whole-product basis.

On June 29, 2010, EPA issued a *Notice on Combination (all-in-one) Clothes Washers*, outlining EPA's strategy to provide an opportunity for these models to demonstrate high efficiency performance on a whole-product basis. This plan has two steps:

1. Establish test procedure that takes dryer energy use into account, and
2. Establish new requirements for all-in-one washer-dryers based on whole-product performance.

With today's letter, EPA is seeking comment on two potential test methods for "all-in-one" washer-dryers proposed by stakeholders.

Method A: Separate determination of clothes washer and clothes dryer energy and water consumption; energy and water consumption from each determination are combined to result in total energy and water consumption for combination units. Under this proposed approach, the clothes washer energy and water consumption are tested using 10CFR430 Subpart B Appendix J1 and clothes dryer energy consumption is tested using DOE SNOPR published June 29, 2010 in the U.S. Federal Register (Vol. 75, No. 124; 37594 - 37650). The results are then combined to reflect total energy and water consumption for combination washer-dryers. Dryer testing would begin at the recommended 42 - 47% RMC per the DOE SNOPR.

Method B: The energy and water consumption for combination clothes washer-dryers is determined from the start of the clothes washer cycle to the finish of the clothes dryer cycle with minimal interruption. Under this proposal, the energy and water consumption of the full washing and drying cycle are determined by CENELEC EN 50229 (aka BS EN 50229:2007 "Electric clothes washer-dryers for household use - Measuring the performance"). As an alternative, clothes washer energy and water consumption are determined by the current 10CFR430 Subpart B Appendix J1 test and the dryer energy is determined using the principles of EN 50229; dryer testing begins with the remaining moisture content (RMC) after the normal wash cycle is completed.

The test procedure working group identified pros and cons with each method:

Method A:

Pros:

- Consistent with proposed DOE standard for testing the dryers per SNOPR
- The standard is ready to be used (no extra development time required)
- The consumption of the drying phase of the washer-dryer can be directly compared with the dryer energy consumption of separate clothes dryer units
- The consumption of the washing phase of the washer-dryer can be directly compared with the washer energy and water consumption of separate clothes washer unit
- Should not have to revise test, or minor revision would be required, after DOE finalizes dryer test method

Cons:

- May not be representative of consumer use as the customers may generally use the full washer-dryer cycle
- Longer time to do the tests because the load has to be spun and/or extra RMC preparation is required at the end of the washing cycle to reach the correct starting moisture
- Test may not represent actual %RMC after washer cycle for all units

Method B:

Pros:

- May be representative of consumer use as the customers may generally use the full washer-dryer cycle
- The consumption of the washing phase can still be compared with other washing machines while the total energy + water consumption can be compared only with other combo machines, this would set a new category of machines within ENERGY STAR program
- The testing procedure is quicker because it would be possible to wash and directly dry the load without much interference from the operator
- The machines with low %RMC after washing would have better drying results while those with higher % RMC after washing would have worse drying results (Note that this difference can be limited by a requirement that the clothes washer phase MEF and WF meet the current ENERGY STAR requirements, since %RMC factors into MEF determination)

Cons:

- The standard is not ready and would have to be to be adapted - it will take development time
- The consumption of the drying phase of the washer dryer cannot be directly compared with the dryer

EPA seeks comment on these approaches to testing **All-in-One Clothes Washer-Dryers** for use by the ENERGY STAR program. In particular, EPA seeks comment on each method's ability to deliver accurate, fair, and consistent results. Please provide comments to me at Taddonio.kristen@epa.gov by *Tuesday, August 24th, 2010*. Based on these comments, EPA will release for stakeholder comment a second draft test method proposal, and will host a stakeholder conference call on Tuesday, August 31st at 3:00 pm US Eastern Time to discuss the test method. Please call into 866-299-3188 (alternate number 1-706-758-1822) access code 202-343-9234#.

All updates will be posted at www.energystar.gov/productdevelopment.

Thank you for your support of ENERGY STAR.

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