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August 13, 2021

Via E-Mail

Ann Bailey, Director
ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

MostEfficient@energystar.gov

Re: ENERGY STAR Proposed Recognition Criteria for Most Efficient 2022

Dear Ms. Bailey:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the Environmental Protection Agency's (EPA) proposed recognition criteria for ENERGY STAR Most Efficient 2022. AHAM continues to be concerned about EPA's failure to provide the basic data upon which it relies to make Most Efficient recognition criteria proposals. This is inconsistent with EPA's stated procedures for the amendment of eligibility criteria for the underlying product specifications and its goal of providing transparent analysis to stakeholders.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The appliance industry directly employs over 377,000 workers in the U.S. and AHAM members produce more than 95% of the household appliances shipped for sale domestically. The industry's total economic impact exceeds \$198 billion. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental impact as new appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for energy efficiency improvement, as long as product performance can be maintained for the consumer. But AHAM is concerned that EPA continues to establish Most Efficient criteria in a manner inconsistent with EPA's Guiding Principles for the ENERGY STAR program (ENERGY STAR Guiding Principles) and its Standard Operating

Procedure for Revising or Establishing an ENERGY STAR Product Specification (Standard Operating Procedure).

EPA has offered little analysis and no supporting data to indicate how or why it has chosen the eligibility criteria in the proposal. For example, there is no analysis or data regarding EPA's proposal to select 45 dB(A) as the sound limit for room air conditioners. In fact, there is not even an explanation as to why EPA is introducing a sound performance requirement. And there is no cost or payback data to justify the levels proposed for standard-size freezers. It is also unclear how many models, "if rated differently," would meet the proposed criteria.

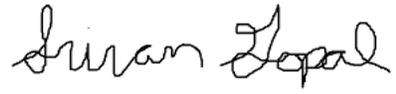
This failure to provide supporting data is inconsistent with the ENERGY STAR Standard Operating Procedure. The Standard Operating Procedure states that in revising specifications, "[a]t the earliest possible point in the process, EPA shares data relied upon in specification development, including publicly-available performance data (or the source where large data sets are used), the Agency's payback analysis in cases where a cost differential for more efficient products exists, and an estimate of savings." There is no reason EPA should not follow that same practice of providing data upon which it relied in its development of Most Efficient criteria.

Moreover, AHAM continues to oppose EPA's proposed performance criteria and reporting for clothes washers and dishwashers in the Most Efficient program. EPA has determined that the tests that are the basis for these criteria are not repeatable and reproducible enough for use in the underlying specification. Yet, EPA uses them for Most Efficient recognition. EPA should not continue to do so. Moreover, though performance is a key factor that should be protected, the better way to address performance is by ensuring that the specification levels EPA selects do not threaten performance.

Finally, AHAM reiterates our view that EPA needs to revisit the assumption that the dishwasher specification requires a continuous cycle of revision. As we stated in previous comments, dishwashers represent a success story for the energy conservation program. Manufacturers, EPA, and DOE have been effective in driving the development of highly energy and water efficient dishwashers. AHAM continues to urge that EPA and DOE sunset the dishwasher specification, establish market penetration targets in an effort to increase dishwasher ownership, and educate consumers on proper dishwasher use to reduce handwashing and pre-rinsing. Consumer education has the opportunity to save far more energy and water than increasing the stringency of the ENERGY STAR specification beyond its current level (or indeed the energy conservation standard beyond that level). This approach also avoids performance concerns inherent in moving the ENERGY STAR specification eligibility criteria beyond Version 6.0. AHAM would welcome the opportunity to work together with EPA and other stakeholders on a consumer education effort.

AHAM appreciates the opportunity to submit comments on EPA's proposed recognition criteria for ENERGY STAR Most Efficient 2022 and would be glad to further discuss these matters should you so request.

Respectfully submitted,



Sriram Gopal
Director, Technology and Environmental Policy