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September 5, 2018

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 2019

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 2019. 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. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. 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 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. EPA indicates that the proposed recognition criteria for 2019 were chosen based on an analysis of currently certified ENERGY STAR models and the engineering analysis DOE conducts for covered products. Yet, EPA has not provided that analysis for stakeholders to review nor has it described it in any level of detail in its proposals. The proposals seem to be coming from a black box.

This failure to provide supporting data is inconsistent with the recently established ENERGY STAR Standard Operating Procedure. The Standard Operating Procedure indicates 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. It is difficult, if not impossible, to provide EPA with sufficient or any informed feedback without knowledge of how EPA reached its proposal.

### Clothes Washers

EPA proposes a minimum cleaning performance floor based on data derived from test results partners participating in a pilot use of the ENERGY STAR cleaning performance test method for clothes washers provided. AHAM has concerns with this for two reasons.

First, EPA indicated in its final Version 8.0 specification for clothes washers that, because the test procedure has not been demonstrated to be repeatable or reproducible, it would not reference the test procedures, but would instead invite partners to participate in a pilot use of the test method. No data has been provided from that pilot project. Thus, there is still no evidence to suggest that the test produces valid or comparable results. Accordingly, EPA has done nothing to alleviate the concerns AHAM raised regarding the test’s repeatability and reproducibility and that EPA itself acknowledged when it decided not to include optional cleaning score reporting in the Version 8.0 clothes washer specification. EPA, thus, should not be basing Most Efficient criteria on results from that test. To do so ignores the findings it made when it finalized the underlying clothes washer specification.

Second, EPA has not provided the data underlying the proposed cleaning level. Accordingly, stakeholders cannot evaluate whether the proposed level is reasonable.

### Dehumidifiers

EPA proposed to translate recognition criteria for dehumidifiers to IEF. EPA indicates that it worked with DOE to develop values that are roughly equivalent in stringency to the current EF recognition criteria. But EPA provided no data on the crosswalk it did with DOE and, thus, stakeholders cannot evaluate or comment upon its analysis or the result.

Refrigerator-Freezers

EPA proposed updated criteria for certain classes of refrigerator-freezers. But, yet again, EPA provided no data to justify those proposals or to explain why those product classes were selected for updated criteria. Thus, commenters cannot meaningfully provide feedback to EPA on its proposal.

AHAM appreciates the opportunity to submit comments on EPA's proposed recognition criteria for ENERGY STAR Most Efficient 2019 and would be glad to further discuss these matters should you so request.

Best Regards,

A handwritten signature in black ink that reads "Jennifer Cleary". The signature is written in a cursive style with a large, looping initial "J".

Jennifer Cleary  
Director, Regulatory Affairs