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September 8, 2015

Via Email

Ann Bailey, Director
ENERGY STAR® Product Labeling
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
Most Efficient@energystar.gov

Re: ENERGY STAR's Most Efficient Proposed 2016 Recognition Criteria

Dear Ms. Bailey:

Thank you for the opportunity to comment on the latest Most Efficient Recognition Criteria.

The serious concerns we have had with the “Most Efficient” ENERGY STAR Program have been well documented throughout the various sets of written comments we have submitted to EPA since the program first began in 2011. Whether it is the flawed cleaning criteria for dishwashers, the inconsistencies with the ENERGY STAR Program Guiding Principles, or the many other issues we have communicated, all still remain and have not been addressed in a way that would be mutually beneficial for all stakeholders. As such, we cannot support the Most Efficient 2016 program as proposed, but will continue to stay informed by monitoring all relevant sources of data in our ongoing evaluations of the program. Also note, as a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the comments they submitted (under separate cover). Please be advised that we strongly support and echo the positions taken by AHAM.

As always, we would be happy to discuss our concerns in detail if ENERGY STAR Most Efficient is interested. Either way, as we have said many times before, our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise will continue to be a strong source of pride for our company. Thank you again for your consideration and please be sure to contact me with any follow up questions or comments.

Respectfully,

A handwritten signature in black ink that reads "Nick Gillespie". The signature is fluid and cursive, with a long horizontal stroke at the end.

Nick Gillespie
Senior Manager, Regulatory Affairs