

August 22, 2019

Via Email

Ms. Ann Bailey
U.S. Environmental Protection Agency
ENERGY STAR® Product Labeling
MostEfficient@energystar.gov

Re: ENERGY STAR Proposed Recognition Criteria for Most Efficient 2020

Dear Ms. Bailey:

Thank you for the opportunity to comment on the Environmental Protection Agency's (EPA) proposed recognition criteria for ENERGY STAR Most Efficient 2020. We appreciate the collaboration that continues to be encouraged by the EPA and shared between its stakeholders.

Whirlpool Corporation is the world's leading manufacturer of major home appliances, with approximately \$21 billion in annual sales in 2018, 68 million products sold annually, 92,000 global employees, 22,000 employees in the U.S., and 65 manufacturing and technology research centers around the world. We sell major and small appliances under brand names such as Whirlpool, Maytag, KitchenAid, Amana, Jenn-Air, Consul, Brastemp, Bauknecht, and Indesit in nearly every country throughout the world.

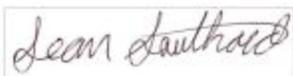
As we've stated in past comments to EPA on proposed recognition for Most Efficient, we do not believe that recognition criteria for various product classes should be combined. We again ask that EPA consider developing separate qualification criteria for the clothes dryer product classes, instead of the proposed single recognition criteria for all electric dryers without distinction for compact vs. standard size, 120V vs. 240V, and vented vs. ventless.

The reasons that product classes should be separated for dryers are as follows:

- 1) It would allow for recognition of the unique characteristics of electric dryers. This includes unique voltage, venting, and capacity characteristics, which can all have a profound impact on the energy efficiency and drying performance of models.
- 2) This would allow for possible future models to qualify for Most Efficient, which may not be able to meet a combined product class CEF level. For example, a small capacity model tested with a 3 lb load may not be able to achieve the same CEF as a large capacity dryer tested with an 8 lb load, but both may be similarly efficient if tested with the same load. Without the ability to qualify for Most Efficient and earn eligible rebates, consumers and utilities may miss out on the energy savings offered by these models.
- 3) Creating separate criteria for all clothes dryer product classes would align Most Efficient recognition criteria with the product classes used for U.S. Department of Energy (DOE) minimum standards, and even for the ENERGY STAR Clothes Dryers Version 1.1 recognition criteria. There is a reason that DOE and ENERGY STAR standards are separated by product classes, due to the inherent efficiency differences between them.

Thank you again for your consideration and we look forward to continued discussion on Most Efficient recognition criteria.

Sincerely,

A handwritten signature in cursive script that reads "Sean Southard". The signature is enclosed in a thin, light-colored rectangular border.

Sean Southard
Senior Manager, Regulatory Affairs
Whirlpool Corporation