

August 30, 2018

Via Email

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

Re: ENERGY STAR Proposed Recognition Criteria for Most Efficient 2019

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 2019. We appreciate the collaboration that continues to be encouraged by the EPA and shared between its stakeholders.

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) on this specification update proposal. **Please be advised that we support and echo the positions taken by AHAM. Our comments address concerns we have where AHAM cannot take an industry position.**

These comments do not, however, address the significant concerns that we have documented in the past about the ENERGY STAR Most Efficient Program, since its inception in 2011. Given that these concerns have still largely not been addressed, we continue to not participate in the marketing of the program, but openly collaborate with EPA in the development of recognition criteria.

As stated in many of our previous comments on ENERGY STAR Most Efficient proposed recognition criteria, we believe that EPA should always separate efficiency criteria by product class. The unique performance characteristics of different product classes merit separate efficiency criteria. For example, a top load washer cannot spin to the highest speed of a front load washer, and therefore cannot extract as much water from clothes, often resulting in a lower overall energy efficiency.

Combining the efficiency criteria across multiple product classes ultimately will limit consumer choice. For example, consumers have a broad set of front load washers meeting ENERGY STAR Most Efficient 2018 criteria to choose from, but do not have the same for top load washers because criteria is not separated for the two product classes. We continue to ask EPA to consider developing separate efficiency criteria for all home appliance product classes.

On the proposed criteria for clothes washers, we do not agree with the addition of the minimum average maximum load cleaning score, as assessed by the final draft ENERGY STAR Test Method for Determining Residential Clothes Washer Cleaning Performance. In our comments during the Version 8.0 ENERGY STAR Clothes Washer specification development

process, we raised several issues with the development and use of a cleaning performance test procedure.

First, EPA has not appropriately documented the potential performance issues of washers meeting the ENERGY STAR Most Efficient criteria. Without evidence of these performance issues, EPA should not require the additional testing burden for manufacturers to perform this testing. If there are documented performance issues, we would instead recommend that EPA account for this in the development of levels that allow products to maintain acceptable performance.

Second, we have concerns about the repeatability and reproducibility of the draft cleaning performance test procedure. Testing done by AHAM members showed significant variation in the results, due to detergent and soil strips.

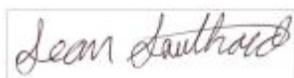
Third, the draft cleaning performance test procedure is burdensome. We would have additional cost and logistical burden to equip our energy test lab for the performance test, or conduct testing in two separate labs (one for energy and one for performance).

Fourth, we do not believe that EPA should set criteria in areas beyond energy and water efficiency, even in a program such as Most Efficient. Competition and market forces compel manufacturers to maintain or enhance cleaning performance at increased efficiency levels; not ENERGY STAR.

Finally, we do not support the use of a test method before it is finalized and has the acceptance of stakeholders. There are several areas of the final draft test method that we believe need to be addressed before it could be finalized. It is not a good precedent to use draft test procedures as if they are final.

Thank you again for your consideration and we look forward to continued collaboration. As always, please do not hesitate to ask us for any clarifications on these comments.

Sincerely,

A handwritten signature in cursive script that reads "Sean Southard". The signature is enclosed in a thin black rectangular border.

Sean Southard
Manager, Regulatory Affairs
Whirlpool Corporation