

February 16, 2017

ENERGY STAR Product Development  
U.S. Environmental Protection Agency

Sent via email to: [appliances@energystar.gov](mailto:appliances@energystar.gov)

RE: ENERGY STAR Clothes Washer Specification Final Draft Version 8.0

Please accept these comments on behalf of the American Council for an Energy Efficient Economy (ACEEE) on the proposed *ENERGY STAR Final Draft Version 8.0 of the Clothes Washer Specification* from February 2, 2017. We appreciate the opportunity to comment on the draft recognition criteria, and value the work you have done to showcase high performing products in a number of product categories.

We offer the following comments on the draft specification.

**Support for changes in scope**

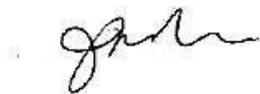
ACEEE supports EPA's decision to exclude commercial top-load clothes washers from the program's scope. This exclusion should continue unless a sufficient number of high-performing top-loading models are available in the market with efficiency comparable to front-loading commercial washers. We also support scope changes to include high-efficiency residential washers with supplementary wash systems and to exclude combination all-in-one washer-dryer products.

**Support for a single criteria for front-loading and top-loading washers.**

We disagree with EPA's decision to maintain separate energy and water efficiency criteria for residential top-loading and front-loading washers. Expanding the difference in energy and water efficiency requirements between the two classes of products dilutes the strength of ENERGY STAR as an indicator of true market leadership in energy efficiency. The difference in required performance for products performing the same function is hard to justify in terms of energy and water savings and added costs to consumers. At this point, a single criteria for all washers is warranted. We also remain concerned that continuing to recognize lower-efficiency top-loading models will expand their market share relative to higher-performing products.

Thank you for the opportunity to provide comments.

Sincerely,



Jennifer Amann  
Buildings Program Director