



Alliance Laundry Systems LLC
Shepard Street, P.O. Box 990
Ripon, WI 54971-0990
Tel 920.748.3121
Fax 920.748.4301
www.alliancelaundry.com

November 21st, 2016

Melissa Fiffer
Product Manager, ENERGY STAR Appliance Program
U.S. Environmental Protection Agency
appliances@energystar.gov

Subject: ALS Comments RE: ENERGY STAR Product Specification Draft 2 for Clothes Washers Version 8.0

Dear Ms. Fiffer:

Thank you for the opportunity to comment on the 2nd draft proposal for the ENERGY STAR eligibility criteria for the clothes washer version 8.0. Alliance Laundry Systems respectfully submits these comments concerning the latest draft proposal.

Alliance Laundry Systems (ALS) is North America's largest commercial laundry equipment manufacturer. We manufacture residential and commercial clothes washers and dryers under the Speed Queen™, Huebsch™, Unimac™, Primus™, and IPSO™ trademarks in Ripon, Wisconsin. We employ approximately 1,700 people.

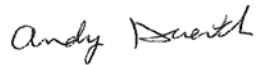
ALS supports the comments made by the Association of Home Appliance Manufacturers (AHAM) concerning this topic. In addition, ALS makes the following comments:

- ALS opposes 8 cubic foot commercial capacities as no waivers are present for commercial washers, and in addition, the increase in capacity does not necessarily equate to better energy efficiency. Ultimately, in this category in most cases the end user will use approx. 7-8 lbs for an average load size. Higher capacities simply inflate the energy and water efficiencies for test purposes, not really helping the consumer save energy unless they truly load the machine in a way that matches the load sizes that meet the DOE's definitions. Extreme capacities can also create issues where a user can't reach the back or bottom of the tub, limiting the usefulness to the consumer.
- ALS opposes a single commercial category (TLW and FLW) that penalizes TLWs and effectively removes them from the ES market. No TLWs on the market would be able to reach the V8 levels. As evident in the Commercial CW scatterplot from the ES data & Analysis Package dated July 14th, 2016, no TLW's are near the proposed limits and only a single Top load washer meets the current energy star criteria, much less the new criteria. The Department of Energy has taken a stance that it makes sense to keep the categories separate, and that the two types are significantly different. If the 25% analysis is done with separated categories (TLW vs FLW) EPA would find that the FLW number might be tightened to

the proposed level, but the TLW would remain where it is or possibly be higher. This analysis should at least be considered.

- ALS opposes a commercial washer standard that is more stringent than a residential standard. Commercial customer's expectations are such that they expect higher performance levels and increased utility when using a commercial machine. The commercial customer is paying a premium to use a commercial machine and its utility. In addition, a commercial washer is expected to successfully launder more difficult/challenging soil conditions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Andy Huerth".

Andy Huerth
Engineering Manager – Regulatory Compliance
Alliance Laundry Systems LLC

Cc: Tim Studt, VP Product Engineering