

BSH HOME APPLIANCES CORPORATION

BSH Home Appliances Corporation, 1901 Main Street, Suite 600, Irvine, CA 92614

Via e-mail: appliances@energystar.gov

Melissa Fiffer
ENERGY STAR Appliance Program
US Environmental Protection Agency

Your ref./communication of:
Our dept./abbr.: RNA/MK-GA

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E-Mail: Manfred.Staebler@bshg.com
Irvine, 02/15/2017

Re: ENERGY STAR Product Specification Draft 2 Clothes Washers Version 8.0 and Draft Test Method for Determining Residential Clothes Washer Cleaning Performance

Dear Mrs. Fiffer,

BSH Home Appliances Corporation respectfully submits the following comments to the Environmental Protection Agency (EPA) in regard to the ENERGY STAR Clothes Washers Draft 2 Version 8.0 specification.

BSH Home Appliance Corporation is headquartered in Irvine, California, and manufactures appliances sold under the Bosch, Thermador and Gaggenau names. BSH has factories in North Carolina and Tennessee, with warehouses, sales offices and show rooms throughout the United States.

1) Qualification Criteria:

Residential Top-loading Washers

The proposal in Draft 2 to keep the qualification for top-loading washers unchanged will further widen the energy gap between front and top loading models. We do not see a large enough differentiation in consumer benefits to keep these two technologies on separate energy efficiency requirements.

...2

page 2

2) Connected Criteria:

BSH opposes the 5% connected credit.

- a. BSH does not see any energy savings through demand-response. We see the benefit of lowering energy demand peaks in the grid, but this should not trigger a less stringent energy value for ENERGY STAR products. As more energy efficient the appliance is in itself, the less impact it has on energy peaks.
- b. We also do not see the argument the 5% energy credit would kick-start the market for connected appliances.
 - i. A good example is the 5% credit given for refrigerators, which in our opinion did not kick-start the market for connected refrigerators. This 5% credit was based on ENERGY STAR being 20% above DOE value. Changes to DOE MEPs in 2014 resulted in ENERGY STAR being 10% above DOE value. The 5% connected allowance did not change and now the connected criteria make up 50% of the ENERGY STAR value.

3) Proposed Cleaning Performance Test Procedure

BSH appreciates that the EPA removed the voluntary performance reporting option from the specification and we do intend to participate in the EPA's invitation to conduct these test, gather data and gain experience. However, BSH cannot commit to sharing data until the details of what data EPA and DOE will gather, evaluate, use and publish is clearly stated. When EPA's and DOE's concepts, strategy and intent for using the data from the pilot are clearly defined, BSH is willing to participate in the pilot.

After the pilot and until such time as there is clear proof that cleaning performance testing procedures are repeatable and reproducible BSH cannot agree to having this type testing included in the Energy Star specification.

...3

page 3

4) Loading of Test cloths with test strips

From our test experience the loading of the test cloths with test strips is important. In that respect lines 135 thru 137 from the file "*Product Specification for Residential Clothes Washers Final Draft Test Method for Determining Residential Clothes Washer Cleaning Performance*" should be change to:

b) Front-loading clothes washer: Load 14 test cloths without test strips followed by 2 test cloths with attached test

strips, ensuring an even distribution of test cloths without test strips **and there is no overlapping of the 2 test**

cloths with attached test strips with each other. Repeat this sequence until the final test cloths with the attached

test strips are loaded;

Kind regards,



Manfred Staebler
Vice President Government Affairs