

March 1, 2017

Ms. Melissa Fiffer  
US Environmental Protection Agency  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. Fiffer:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to Final Draft Version 8 of the ENERGY STAR Clothes Washer Criteria, released by the Environmental Protection Agency (EPA) on February 2<sup>nd</sup>, 2017.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 46 US states, the District of Columbia, and seven Canadian provinces. In 2014, CEE members directed over \$6.7 billion of the \$8.7 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of continuous improvement and further strengthening ENERGY STAR so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide comment.

## **CEE Recommends a Technology Neutral Approach for the Program, But Respects the Decision to Move Forward with Version 8 Given the High Percentage of Certified Products.**

CEE encourages ENERGY STAR to specify performance criteria that provide manufacturers with full flexibility in designing and engineering products to achieve binational efficiency targets, while also preserving the opportunity for engineering and technology to evolve. Our assessment is that

separate requirements for top and front loading clothes washers can create an unlevel playing field and accordingly undermine the elegant and effective simplicity of the Program's success.

EPA indicates a desire to separately specify energy and water use criteria for front and top loading clothes washers so as to provide the program with the ability to continue to recognize a selection of highly efficient top-loading clothes washers while better ensuring only the most efficient front-loading clothes washers qualify as ENERGY STAR. We believe the proposed efficiency criteria effectively serve these objectives.

While CEE recommends that the program be neutral on technology and tub configuration, we acknowledge that 56 percent of units shipped in 2015 were ENERGY STAR certified, well above Program guidelines. CEE members depend on ENERGY STAR to differentiate highly efficient products to achieve their long term savings goals. Therefore, we agree that stronger ENERGY STAR criteria are necessary to effectively differentiate highly energy efficient clothes washers in the market, and we respect EPA's decision to move forward.

CEE would once again like to thank the EPA for the opportunity to comment on Draft Final Version 8 of the ENERGY STAR Clothes Washer Criteria. Please contact CEE Senior Program Manager Eileen Eaton at (617)-337-9263 with any questions about these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski".

Ed Wisniewski  
Executive Director