

December 13, 2016

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 Draft 2 Version 8 of the ENERGY STAR Clothes Washer Criteria, released by the Environmental Protection Agency (EPA) on October 21, 2016.

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 45 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 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 these comments.

CEE Supports Increased Energy Performance Requirements

CEE supports EPA efforts to revise the ENERGY STAR Clothes Washer Criteria given that 56 percent of units shipped in 2015 were ENERGY STAR certified. We agree that stronger ENERGY STAR criteria will be necessary to effectively differentiate highly energy efficient clothes washers in the market in 2018. We support EPA moving to ENERGY STAR Most Efficient requirements adopted in 2015, an integrated modified energy factor of 2.74 for front loaders, given that manufacturers have built products to meet this performance level and it now represents 39 percent of front loading models on the ENERGY STAR product list. The CEE Appliance

Committee has determined this level of performance offers sufficient energy and water savings over the minimum efficiency standard and provides adequate product offerings to enable active participation in programs. This level also aligns with the current CEE Tier 2 requirements.

CEE Supports Technology Neutral Performance Requirements for Clothes Washers

Based on the objectives of efficiency programs, expectations bestowed upon those investing ratepayer funds, and the lifting of previously presumed technological limits, CEE recommends returning to a practice of specifying objective indicators of performance, independent of technology or orientation. Accordingly, CEE has consistently supported a technology neutral approach within its performance specifications on the grounds that specifications are most effective when one set of requirements is applied to a product category, regardless of size or configuration, as a means of ensuring that consumers have ease of understanding and comparability across the full range of available products. CEE's approach of focusing on efficiency criteria is intended to 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 independent of previous limitations and the like.

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. In particular, CEE is concerned about unduly influencing the cohort of consumers who are not prejudiced by configuration as they enter the purchasing decision. Believing the energy savings to be equivalent among ENERGY STAR models could lead a consumer to purchase a less efficient top load model over a more efficient front loading machine. In such instance, both the consumer and the efficiency program experience lose. In an effort to avoid contributing to confusion among consumers and avoid uninformed purchasing, CEE recommends that EPA require the same level performance for all ENERGY STAR clothes washers regardless of configuration.

CEE would once again like to thank the EPA for the opportunity to comment on Draft 2 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,



Ed Wisniewski
Executive Director