

Topic	Comment	EPA Response
Laundry Centers	One stakeholder agrees with EPA's decision to revise the Draft 1 laundry center definition to remove the phrase "and is powered by a single electric power source."	EPA thanks the stakeholder for the contribution.
Combination All-in-One Washer-Dryers	<p>Three stakeholders do not agree with EPA's intention to measure the water consumption of the dryer element. Two of these stakeholders feel that there would be minimal environmental benefit to this requirement because water-cooled combination washer-dryers are such a small part of the U.S. market, while another stakeholder cites the lack of a published test method and publicly available data on dry-cycle water use. Additionally, two of these stakeholders expressed concern that reporting water use may mislead consumers into believing air-cooled dryers are more environmentally friendly than water-cooled dryers, when this may not be the case. Despite these misgivings, the stakeholders would be willing to work through an AHAM task force to develop a test method, should it be required.</p> <p>Another stakeholder believes that it would not be appropriate for these products to be eligible for the ENERGY STAR program without testing for the water consumption of the dryer.</p>	EPA agrees this is a niche product and considering this and the lack of applicable test method, EPA has determined that pursuing this product for inclusion in the ENERGY STAR program is not practical at this time.
Commercial Clothes Washers	<p>One stakeholder proposes a sunset of commercial top-load washers from the V8.0 specification because there is currently only one commercial top-load model in the market that meets the V7.1 specification, and none that meet the V8.0 criteria. This would allow for further efficiency gains in commercial front-load washers while recognizing the technical limits to increasing efficiency in top-load washers. Citing the same evidence, another stakeholder opposes a single category for commercial top-load and front-load washers.</p> <p>Two additional stakeholders oppose EPA's proposal to extend the commercial clothes washer scope to allow products up to 8 cubic feet to be ENERGY STAR certified. One of these stakeholders noted that higher capacities simply inflate the energy and water efficiencies for test purposes, while the other noted that it is unknown whether the current DOE test in Appendix J2 is appropriate for large commercial clothes washers.</p> <p>In addition, one stakeholder disagrees with EPA's use of a different definition than DOE for commercial clothes washers, explaining that EPA and DOE should use the same definitions for clarity and transparency.</p>	<p>Recognizing lack of ample availability of top loading models that meet leadership efficiency levels and performance concerns with the very limited models that do meet current ENERGY STAR requirements, EPA has decided to exclude commercial top-load models from the program's scope at this time. Therefore, only front-load washers will be included in the commercial clothes washer scope. If there is a demonstrated improvement efficiency and performance, EPA will consider bringing top-load washers back into the scope of the clothes washer program.</p> <p>EPA notes that DOE has granted a waiver to test residential clothes washers with capacities greater than 6.0 cubic feet. Further, DOE has determined that since the differences between residential and commercial clothes washers are relatively minor, the table from the DOE waiver is applicable to the commercial extension. EPA is including the test load size table from the applicable DOE waiver in the final specification to alleviate this concern. Regarding inflated energy and water efficiencies, EPA has not seen evidence that energy and water efficiency test results would be inflated.</p> <p>In the V7.0 clothes washer specification, EPA proposed a change to the commercial clothes washer definition in response to stakeholder feedback indicating the specification should not be applied to larger washer-dryer extractors used in commercial facilities, i.e., hospitals. EPA continues to believe that this amendment to the definition is the clearest and most straightforward way to clarify the scope.</p>
Connected Criteria	<p>One stakeholder believes the changes made in the specification under demand response (Section G1b) in both drafts limit the consumer's capability to override to one cycle, and requests the language be changed to allow a four-hour period after the initial override cycle to allow a consumer to wash subsequent loads without having to respond to additional override requests.</p> <p>Another stakeholder is concerned that until a test method is complete, manufacturers have limited incentive to invest in developing new products and increasing their market penetration. The stakeholder suggests that EPA gather additional data on how connected products are used by the consumer.</p>	Demand response (DR) overrides enable consumers to override their product's response to DR signals. The Delay Appliance Load request is intended to reduce load during the response period by delaying the start of wash cycles. When the consumer attempts to start a cycle, the appliance responds to the request by not starting, and typically informs the consumer and provides an opportunity to override and start the cycle immediately. For long-duration DR events that remain active for subsequent cycles, when the consumer attempts to start a second cycle, the appliance must respond by delaying the start of the wash cycle; the consumer can simply override at the start of each cycle to avoid the delay.
Energy and Water Criteria	<p>Three stakeholders agree with EPA's decision to consider new data and defer revision of the residential top-load washer levels.</p> <p>Three stakeholders disagree with the decision to strengthen the specification for front-load washers and leave top-load washers at current levels. All three stakeholders are concerned that having lower requirements for top-load washers will promote lower-efficiency products. One of these stakeholders also requests EPA share its unpublished market share data.</p> <p>These three stakeholders continue to support combining the product classes for top-load and front-load clothes washers for ENERGY STAR.</p>	Based on analysis of market data that broke out top-load and front-load shipments, EPA determined that ENERGY STAR market share for top-load washers is lagging significantly behind that for front load washers. Based on an estimated ENERGY STAR market share of approximately 30%, EPA has concluded that a revision to the top-load residential clothes washer criteria is not warranted at this time. EPA anticipates that market conditions will have changed in time for the V9.0 revision process such that top-load criteria can be strengthened in a more meaningful way. Stakeholders will find this data in supplemental comments ¹ filed by AHAM on Oct 13, 2016.
Cleaning Performance - Need for cleaning requirement?	Two stakeholders support the development of a cleaning performance test method, while another two stakeholders oppose the development of a cleaning performance test method. One of the stakeholders who supports the development of a test method says EPA should also consider a minimum acceptability factor to deter product configurations from achieving energy efficiency at the expense of performance. The two stakeholders who oppose the test method both expressed concern that EPA has not appropriately described the performance issues that consumers are experiencing with ENERGY STAR washers today. They believe that for EPA to justify the development of a test method/reporting requirement, EPA must first demonstrate the proposed levels would impact product performance.	EPA and DOE have enclosed the test method to measure the cleaning performance of residential clothes washers. Finalizing this test method is consistent with the government and many stakeholders' interest in ensuring that as energy and water efficiency increase, performance is not compromised. EPA and DOE's interest is to advance a mechanism by which cleaning performance can be demonstrated in a repeatable and reproducible manner. To that end, in lieu of an immediate reference to the test procedure in the Version 8.0 Clothes Washer specification, EPA will invite partners to participate in pilot use of the test. Partners interested in participating are encouraged to contact us.
Cleaning Performance - Test Procedure	One stakeholder notes that DOE has not demonstrated that the test procedure proposed is accurate, repeatable, and reproducible. The stakeholder does not believe a test procedure that measures only cleaning performance is relevant to consumers, citing factors such as gentleness and cycle length as more important to consumers. Another stakeholder noted that because the test procedure is still in its infancy, there is little reason to believe it can be completed by the time EPA releases the final V8.0 specification.	Please see a thorough response in the Final Draft specification notebook specific to the test method.
Cleaning Performance - Alternative Test Method	One stakeholder is concerned that DOE has done no actual testing to assess the potential impact of the warm/cold max load cycle and its effects on IMEF and IWF calculations, even if it agrees that it theoretically makes sense to test energy and performance at the same time. More importantly, the stakeholder points out that the alternative test method asks manufacturers to violate the Energy Policy and Conservation Act of 1975 (EPCA). On this basis, the alternative approach should be abandoned from consideration.	In this Draft Final version, DOE has removed the alternative approach from consideration.
Cleaning Performance - Test Burden	One stakeholder appreciates DOE's effort to minimize the test burden, but feels that adding a consumer relevant test would create an unacceptable test burden for manufacturers.	While the proposed test method covers only cleaning performance; other performance parameters could be considered during future test method updates. EPA will work with partners to test run this test method and in doing so will gain further understanding of any realized undue burden.
Effective Date	One stakeholder fully supports the proposed effective date. However, another stakeholder requests that EPA consider moving the Version 8.0 effective date from January 1 to a later date in 2018 after EPA provides greater clarity on cleaning and rinse performance.	EPA has maintained the effective date for the V8.0 specification in alignment with the next change in federal standards. EPA and DOE expect to complete the cleaning test and invite partners to test run the method upon the completion of the Version 8.0 specification.

¹ <https://www.energystar.gov/sites/default/files/asset/document/AHAM%20Supplemental%20Comments.pdf>