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September 7, 2016

Via E-Mail

Melissa Fiffer
Product Manager
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

appliances@energystar.gov

**Re: ENERGY STAR Program Requirements
Product Specification for Clothes Washers, Eligibility Criteria, Draft 1,
Version 8.0**

Dear Ms. Fiffer:

Electrolux North America Inc. (ENA), hereby submits comments on the Environmental Protection Agency's (EPA) ENERGY STAR Product Specification for Clothes Washers, Eligibility Criteria, Draft 1, Version 8.0.

ENA is a wholly owned subsidiary of AB Electrolux of Sweden (Electrolux) and, as part of the Electrolux Group, contributes to the design, manufacture and annual sale of millions of home appliance products around the world. In conducting its business, Electrolux has long been known and respected for its position as a global leader in the area of environmental protection. In fact, for each year from 2006 through 2015, the latest year the award has been given, Electrolux was named as the industry leader by the Dow Jones Sustainability Index.

ENA has been an ENERGY STAR partner for several years and appreciates the efforts of EPA and the Department of Energy (DOE) to improve appliance efficiency and to promote the ENERGY STAR program. ENA is also an active member of the Association of Home Appliance Manufacturers (AHAM) and has contributed to and supports the comments being submitted contemporaneously herewith by AHAM on this topic and offers the following comments in addition to those submitted by AHAM.

EPA's Proposed Performance Levels Will Negatively Impact Clothes Washer Performance: The new levels proposed by the EPA for ENERGY STAR clothes washers will likely result in an unacceptable level of performance for the consumer. As a result of the lower

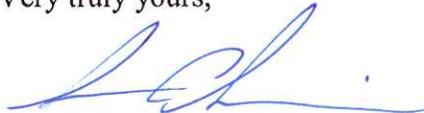
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Integrated Water Factor (IWF) limits, it is increasingly difficult for manufacturers to design and develop energy efficient clothes washers that perform to the level expected by consumers. These clothes washers, though compliant with EPA's lower IWF, will be deemed inferior-performing products in the marketplace and will lead consumers to utilize more non-energy efficient water temperatures, cycles or products to clean their laundry.

EPA's Proposed Laundry Center Requirements Provide a Disincentive to Manufacturers to Certify as ENERGY STAR: ENA appreciates that EPA clarified that laundry centers are eligible for ENERGY STAR certification. However, ENA does not agree that such certification should require both the washer and dryer to be individually ENERGY STAR certified in order for the laundry center to be certified. This is an unnecessary requirement that eliminates any incentive for a manufacturer to invest in technology improvements for either the washer or dryer portion of the laundry center in the event design limitations prevent both from meeting ENERGY STAR levels. Restated, if a manufacturer is unable to achieve ENERGY STAR performance on both the washer and dryer in its laundry center, there is no incentive, under EPA's proposed criteria, to include only the ENERGY STAR-certified product. Moreover, because the clothes washer and dryer of a laundry center must each contain required energy labeling, there is no risk of confusion to the consumer. Because only ENERGY STAR-certified products may include the ENERGY STAR logo on the label, the consumer is clearly informed as to whether one or both products in the laundry center is certified.

ENA appreciates the opportunity to provide comments to the new ENERGY STAR revision for 2018. Please feel free to contact the undersigned or our ENERGY STAR contact if you have any questions.

Very truly yours,



Sean A. Simmons
Senior Assistant General Counsel
Electrolux North America