



**GE APPLIANCES**  
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9th March 2017

Via Email

Melissa Fiffer  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
[appliances@energystar.gov](mailto:appliances@energystar.gov)

RE: Draft ENERGY STAR Test Method to validate Demand Response

Dear Ms. Fiffer:

On behalf of GE Appliances, a Haier company, I am pleased to submit these comments in response to the ENERGY STAR draft Test Method to validate Demand Response for Room Air Conditioners. GE Appliances supports the Association of Home Appliance Manufacturers (AHAM) comments and adopts them by reference. GE Appliances would also like to provide comments on the points below.

### **I. Measurements**

DOE and EPA invited stakeholder comments on the proposed procedure to access the UUT set temperature and potential means to avoid the accidental override of a signal response during testing.

GE Appliances agrees that the set temperature should be determined in accordance with the manufacturer's instructions. We believe there should also be a provision for obtaining the set temperature via a remote mobile or computer application.

### **II. Test Requirements**

While manufacturers can choose to test a single unit or multiple units for purposes of ENERGY STAR certification, only one unit should be required to verify the demand response requirements. The demand response test is long and potentially burdensome for manufacturers and test facilities. Since the demand response tests should have less variability than other portions of the ENERGY STAR tests, one unit should be sufficient.

### III. Delay Appliance Load Test (DAL)

Section 7.1.3 in the draft test method states “Initiate a 4-hour DAL signal and verify that the UUT receives the signal according to manufacturer instructions.”

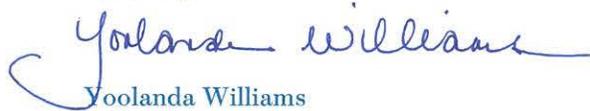
For clarification, should there be a time limit on how long the test should allow for the unit to receive the signal?

### IV. Effective Date

GE Appliances appreciates DOE’s and EPA’s efforts in releasing the draft version of the demand response test procedure. We encourage the DOE and EPA to finalize the test method no later than June 2017 so manufacturers can utilize the new method for the upcoming cooling season.

GE Appliances appreciates the opportunity to submit these comments related to the ENERGY STAR draft test method to validate demand response for Room Air Conditioners, and are happy to answer any questions you may have.

Sincerely,

A handwritten signature in blue ink that reads "Yolanda Williams". The signature is written in a cursive style with a large initial "Y" and a long horizontal stroke at the end.

Yolanda Williams

Program Manager - Regulatory and Compliance