



March 9<sup>th</sup>, 2017

Katharine Kaplan  
U.S. Environmental Protection Agency  
ENERGY STAR™ Appliance Program

appliances@energystar.gov

Re: ENERGY STAR Program Requirements  
Product Specification for Clothes Dryers, Proposed Version 1.1

Dear Ms. Kaplan:

We are writing today in response to comments submitted recently with regard to EPA's proposals for laundry product specification upgrades. We note that in the case of comments on proposed clothes dryer specifications, the Association of Home Appliance Manufacturers (AHAM) submitted no comments with regard to the specification proposals themselves, but instead simply suggested that:

- 1) all work on ENERGY STAR specifications be suspended for an undetermined period of time while the new administration's political appointees take their places and can devote attention to this issue [*"until a department or agency head appointed or designated by the President (or their designee) reviews and approves the action"*]; and
- 2) the ENERGY STAR Program should be moved to USDOE.

These two comments were also part of AHAM's submissions with regard to EPA's proposals for its clothes washer specifications.

NEEA respectfully disagrees with both of these AHAM suggestions based on our experience in working collaboratively with EPA to advance energy efficiency.

NEEA strongly believes that ENERGY STAR specification work should be based on relevant data, good analysis and common sense. NEEA invests heavily in acquiring relevant data and conducting careful analyses to inform the consensus decision-making for which EPA's ENERGY STAR program is known. Based on our knowledge of the marketplace for ENERGY STAR products, developed over the last 20 years, and on our own research, we often share manufacturer concerns and EPA's process allows those concerns to be fully vetted. We see no rationale for or benefit in slowing or halting specification development or publication.

AHAM's second comment – move the program to USDOE, where the energy efficiency standards program is located – is fundamentally at odds with the concept of governance as a voluntary standard. Based on our many years of experience working with ENERGY STAR, we believe that co-location of the regulatory functions at DOE with the voluntary, market-facing third-party certification of efficiency and performance

in the same agency is a bad idea. Doing so is highly likely to compromise the effectiveness of both functions.

Also, at a fundamental level, we beg to differ with AHAM when it comes to assessing the work of an institution of governance – the appropriate metric is “*effectiveness*,” not “*efficiency*,” which is a metric associated with commerce. We believe that EPA’s ENERGY STAR Program has been highly effective in the marketplace for consumer products, and that its track record speaks for itself as what may be the most effective and cost-effective federal program ever devised to save people money, reduce waste, and stimulate the national economy.

In short, we see no benefit whatever in moving the ENERGY STAR Program from its current location at EPA, where marketplace recognition of the brand has been brought to an astounding 90 percent. At the same time we see the potential for serious compromise of its functions if combined with DOE’s regulatory role. Such a move would be very disruptive of this highly effective program.

Thank you for the opportunity to provide comment at this critical time in the ENERGY STAR Program’s evolution. We look forward to many more years of partnering with EPA in this important work.



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