Ms. Kaplan,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program on the draft final specification for the Clothes Washers 8.0 specification revision. After careful review of the proposal, NEEP respectfully submits the following comments.

In general, NEEP is in full support of the updates to the clothes washer specification. The 8.0 specification is critical to maintain continued viability for the clothes washer program. The ENERGY STAR clothes washer specification has been a bedrock element of efficiency programs throughout the Northeast and Mid-Atlantic, 1 as well as nationally through the 2017 planned inclusion into the ENERGY STAR Retails Products Program (RPP). 2 The 7.0 specification, however, has successfully pushed the market to high levels of ENERGY STAR penetration, and the timing and technology development is ripe for a new specification with new levels. The increase efficacy gains from the proposed 8.0 specification will be a boon for the consumer, as well as for efficiency programs and their associated rebates. There continues to be significant variability in the clothes washers market, and a new ENERGY STAR specification will push that market towards viable, affordable energy savings.

As this specification is implemented, efficiency program administrators as well as stakeholders involved in the RPP program will be ready to support and push forward this specification. Overall, this updated specification plays a role in the success of efficiency programs such as RPP which has national retailer support, as well as continued viability for utility programs that are anticipating major changes in their potential retail savings as the residential lighting market transforms. ENERGY STAR is and must continue to serve in a role of a leader in recognition of high performing products, and NEEP looks forward to continuing to support ENERGY STAR’s efforts into the future.

1 2016 List of Northeast Programs offering incentives on ENERGY STAR Dryers: http://neep.org/sites/default/files/resources/Northeast_Appliance_Incentive_Summary.pdf
2 More information: https://www.energystar.gov/ESRPP
Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP to provide comment to the Clothes Washers 8.0 specification revision. Please don’t hesitate to contact me with any follow up questions or clarifications.

Sincerely,

Claire Miziolek
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