



November 30, 2016

ENERGY STAR Production Development
appliances@energystar.gov

Re: Draft 2, 8.0 ENERGY STAR clothes washer specification revision

Thank you for the opportunity to comment on Draft 2, version 8.0 of the Energy Star specification for clothes washers. The comments below address issues in the order in which they are presented in the draft proposal.

Scope: Combination All-in-One Washer-Dryers

NRDC continues to believe that it would be inappropriate for combination all-in-one washer-dryers to be eligible for Energy Star certification, in light of the continued lack of a published test method for determining dry cycle water use, as well as the lack of publicly available data on dry cycle water use. When a test method and test results are available, their eligibility can be reconsidered.

NRDC is interested in joining a working group to explore test methods for water consumption of combination units in dryer mode. We also believe that such a method should be applicable to any ventless dryer seeking Energy Star eligibility.

Additionally, we request that all data provided to Energy Star on dryer mode water usage be made public in a document available for review, with appropriate redaction of brands and models if necessary. It is striking to see in the note on page 2 that at least 20% of total water consumption of combination units is attributable to dryer water use. This information is key to evaluating the suitability for future eligibility of this product category, and should be made public.

Qualification Criteria: Residential Top-Loading Washers

It is difficult to fully assess whether the new proposal to leave efficiency criteria unchanged for top-loading washers is appropriate. The unpublished market share information upon which EPA is relying should be placed in the public record. While a current 30% market share for ES-labeled top-loaders may seem small compared to much higher levels of penetration for ES labeled front-loaders, it nevertheless demonstrates a robust level of market engagement. It would be informative to know what the current market share of qualifying top-loaders would be at the qualification level proposed in Draft 1, and at one or two points between the levels proposed in Draft 1 and Draft 2.

The consequence of the proposal in Draft 2 to keep top-loader qualification criteria unchanged will be to open up a yawning gap between the efficiency levels of Energy Star labeled top-loaders and front-loaders. The proposal would increase the current difference in IMEF from 13% worse to 25% worse, and increase the current difference in IWF from 16% worse to 34% worse. It becomes increasingly problematic to continue to offer the Energy Star label to top-loading washers with essentially the same purpose and functionality as front-loaders but with quite substantially less efficiency of performance. If performance levels between top-loaders and front-loaders cannot remain reasonably close, then the separate eligibility category for top-loaders should be retired.

Test Requirements: Connected Criteria

During the development of the Energy Star specification versions 7.0 and 7.1, EPA solicited comments on the inclusion of a five percent energy credit for connected clothes washers. The credit was to be given to products that were certified using a final Test Method for Residential Clothes Washers to Validate Demand Response. NRDC supported this credit in versions 7.0 and 7.1, with the caveat that it would be temporary and used to “jump-start” the market for connected clothes washers. To date, that test method has not been completed, and therefore no clothes washers have claimed the connected allowance.

NRDC continues to support this credit as a way to stimulate the market, but has concerns about establishing a lower threshold for clothes washer energy efficiency without the corresponding benefits that come from connected criteria.

Once the test method is completed, it is reasonable to expect that the number of connected appliances could grow quickly. Given the increased ease of connecting appliances, more manufacturers could add connected criteria to their machines to offset some of the increase in efficiency stringency specified in Version 8.0. A rapid increase in clothes washers getting the connected allowance would undercut the efficiency gains proposed in Version 8.0, at least in the short term.

The energy and demand-response-related benefits of connected clothes washers are still somewhat uncertain at this point in time. NRDC believes the purpose of the Energy Star program should be, first and foremost, to save energy for consumers. NRDC suggests EPA consider a market penetration threshold for the connected allowance. Once a certain set percent of the clothes washers on the market meet the connected criteria, the allowance should be discontinued. This would incentivize manufacturers to bring more connected products to market, but would ensure that the credit is temporary and is not used as a substitute for energy efficiency.

NRDC requests that EPA gather data about how the connected capability of products is being used by consumers, perhaps by requiring that such data be

reported by manufacturers receiving the connected allowance. This data will help shed light onto the usage and usefulness of the connected criteria, which in turn will help efficiency advocates, utility programs, and others to better understand the potential of these products.

Test Requirements: Cleaning Performance

NRDC welcomes the publication of a new test for cleaning performance. We continue to support the development of minimum cleanability and rinse performance criteria and the inclusion of a reporting requirement for the results of these tests. As stated previously, NRDC strongly supports the development of a cleanability test to ensure that all new Energy Star products continue to offer high performance of their essential functions. We will review the comments of other stakeholders regarding the efficacy of the procedure laid out in Draft 1 of the test method, and reserve further comment on the particulars of the test method until then. However, we believe rinsing performance should also be tested, as this is a critically important performance attribute for consumers. We continue to recommend that reporting of cleaning and rinsing performance test results should be a requirement applicable to all models, once the test method is finalized.

Effective Date: We continue to believe that greater clarity on clean and rinse performance should be established by the time Version 8.0 takes effect. We urge EPA to consider the possibility of moving the effective date from January 1 to a later date in 2018 if needed to allow for industry and other stakeholders to understand and evaluate the clean and rinse performance metrics that will be applied to clothes washers marketed under the Version 8.0 specification.

Sincerely,



Edward Osann
Senior Policy Analyst



Lauren Urbanek
Senior Energy Policy Advocate