

February 16, 2017

Via Email

Katharine Kaplan
U.S. Environmental Protection Agency
ENERGY STAR® Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Product Specification Final Draft for Clothes Washers Version 8.0 and Final Draft Test Method for Determining Residential Clothes Washer Cleaning Performance

Dear Ms. Kaplan:

Thank you for the opportunity to comment on this final draft specification and test method. We appreciate the collaboration that continues to be encouraged by the Environmental Protection Agency (EPA) and shared between its stakeholders.

As a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the comments they submitted (under separate cover) on this draft proposal. **Please be advised that we support and echo the positions taken by AHAM; particularly the position to delay the finalization of the specification during a time of administrative transition and while the new EPA and DOE administrations evaluate additional programmatic changes to ENERGY STAR, the final draft cleaning performance test procedure, and the connected criteria. Our comments supplement those positions and address concerns we have where AHAM cannot take an industry position.**

Scope - Commercial Top Load Washers

We applaud EPA's decision to exclude commercial top load washers from the scope of Version 8.0 specification. We join EPA and other stakeholders in celebrating the achievements of the ENERGY STAR program and manufacturers in advancing the efficiency of these products to their current maximum feasible efficiency level.

Qualification Criteria - Residential Clothes Washer with Supplementary Wash System

While we appreciate EPA's willingness to adapt specifications to new product types entering the market, we do not agree with the approach used by EPA to add a definition for Residential Clothes Washers with Supplementary Wash System and requirements for these products at this late stage of the specification development. Adding something potentially controversial like this into the final draft specification does not allow for full stakeholder consideration and discussion.

While we do not necessarily object to this product type qualifying to ENERGY STAR or the definition proposed by EPA, we still have several concerns. First, we have noticed that several of these models under this product type from one manufacturer have already been qualified to the current Version 7.1 residential washer specification. Given that this product type is not defined and does not have special requirements in the Version 7.1 specification, we do not

believe it is appropriate for EPA to allow these products to certify to this current ENERGY STAR specification. EPA should disqualify these products until the Version 7.1 specification can be amended or the Version 8.0 specification becomes effective.

Second, consumers may be confused about the use of the ENERGY STAR label on a product with two separate washing system. EPA has proposed that the smaller, supplementary washer only needs to meet federal minimum standards, instead of the ENERGY STAR Version 8.0 energy and water levels met by the larger wash system. Consumers may incorrectly believe that both washing systems meet ENERGY STAR requirements by virtue of being labeled with ENERGY STAR, or that the smaller washer is more efficient than the larger washer (which is far from the truth). Many consumers generally believe that something smaller will be more efficient (e.g., small cars are more efficient than large cars), and users of these products could change their washing habits to prefer using the less efficient smaller washer over the larger, more efficient main washer. We recommend that EPA require these Residential Clothes Washers with Supplementary Wash Systems to appropriately use disclaimer statements that the smaller washer does not meet more efficient ENERGY STAR requirements and only meets federal minimum energy and water levels.

Optional Reporting for Residential Clothes Washer Cleaning Performance

We applaud EPA's decision to remove the reference to the Cleaning Performance Test Procedure in the Version 8.0 specification, which eliminates the voluntary reporting aspect from the specification.

Proposed Cleaning Performance Test Procedure

We still maintain that the creation of a cleaning performance test procedure is entirely unnecessary. As we have commented previously, EPA has not even documented the potential performance issues with washers meeting current Version 7.1 criteria, let alone how this could become worse with washers meeting the levels proposed in the Version 8.0 specification. EPA, DOE, and manufacturers should not devote resources towards developing a test procedure for an undocumented and potentially nonexistent problem, without a known consumer benefit. If there is a known and documented performance issue, this should be accounted for in the development of levels that can deliver consumer-acceptable performance at a reasonable payback period.

While we appreciate the additional test data provided to address our concerns with repeatability, we still share concerns with AHAM about the repeatability and reproducibility of the test procedure, documented in recent industry testing. This recent testing showed significant variation due to detergent and soil strips. We also remain concerned about the manufacturer burden that so far has not adequately been considered and addressed. For a manufacturer like Whirlpool, this would mean additional cost and logistical burden to either equip our energy lab with the test equipment needed to conduct this performance testing, or conduct testing in two separate lab locations. In addition, there would be the cost of purchasing the DOE test cloth and potentially maintaining separate DOE test cloth that can be used with

this performance test procedure. DOE has not addressed whether the test cloths used for performance testing could also be used for energy testing.

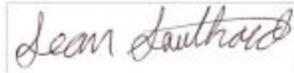
Summary

We appreciate the opportunity to comment on the ENERGY STAR Final Draft Version 8.0 Clothes Washer specification and Final Draft Test Method for Determining Residential Clothes Washer Cleaning Performance. We want to thank EPA again for their willingness to consider our input, and especially for the decisions to remove top load commercial washers from the scope and remove the reference to the cleaning performance test procedure.

We still have several remaining concerns in the Final Draft specification and cleaning performance test method. Among our biggest concerns are the repeatability, reproducibility, and manufacturer burden problems with the proposed cleaning performance test method, and the criteria for Residential Clothes Washer with Supplementary Wash System. We ask that EPA and DOE delay finalization of the specification and test method until they can be reviewed with the new administrations, among other potential programmatic changes to the ENERGY STAR program.

Thank you again for your consideration and we look forward to continued collaboration. As always, please do not hesitate to ask us for any clarifications on these comments.

Sincerely,

A handwritten signature in cursive script that reads "Sean Southard". The signature is enclosed in a thin black rectangular border.

Sean Southard
Manager, Regulatory Affairs
Whirlpool Corporation