

August 25, 2017

Via Email

Ann Bailey  
U.S. Environmental Protection Agency  
ENERGY STAR® Product Labeling  
[MostEfficient@energystar.gov](mailto:MostEfficient@energystar.gov)

**Re: ENERGY STAR Proposed Recognition Criteria for Most Efficient 2018**

Dear Ms. Bailey:

Thank you for the opportunity to comment on the Environmental Protection Agency's (EPA) proposed recognition criteria for ENERGY STAR Most Efficient 2018. We appreciate the collaboration that continues to be encouraged by the 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 specification update proposal. **Please be advised that we support and echo the positions taken by AHAM; particularly the positions about the criteria development process, development and use of alternative test procedures, and efficiencies associated with managing major appliances under a single agency. Our comments address concerns we have where AHAM cannot take an industry position.**

These comments do not, however, address the significant concerns that we have documented in the past about the ENERGY STAR Most Efficient Program, since its inception in 2011. Given that these concerns have still largely not been addressed, we continue to not participate in the marketing of the program, but openly collaborate with EPA in the development of recognition criteria.

As stated in our comments to the ENERGY STAR Most Efficient 2017 criteria, we believe that EPA should not combine the recognition criteria for all electric dryers in a single "Electric" dryer product class. We continue to ask EPA to consider developing separate qualification criteria for clothes dryer product classes.

Creating separate criteria for the product classes would have several benefits:

- 1) It would allow for recognition of the unique characteristics of electric dryers. This includes unique voltage, venting, and capacity characteristics, which can all have a profound impact on the energy efficiency and drying performance of models.
- 2) This would allow for current heat pump dryers on the U.S. and Canada market to qualify for ENERGY STAR Most Efficient 2017. Whirlpool has four heat pump models in the U.S. and Canada that are not currently able to qualify to Most Efficient even though they are significantly more efficient than other non-heat pump models in the product class (WHD3090G\*\*, WHD5090G\*\*, YWHD3090G\*\*, and YWHD5090G\*\*). These are

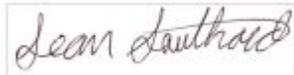
non-hybrid heat pumps that are currently certified to a 3.71 CEF. They are in the Ventless, Electric Compact (240V) product class. Without the ability to qualify for Most Efficient and earn eligible rebates, consumers and utilities may miss out on the energy savings offered by these models.

- 3) Creating separate criteria for all clothes dryer product classes would align Most Efficient recognition criteria with the product classes used for U.S. Department of Energy minimum standards, and even for the ENERGY STAR Clothes Dryers Version 1.1 recognition criteria.

We recommend that EPA work to develop separate recognition criteria for both the Normal cycle setting and the normal, maximum dryness cycle settings across all product classes. We are interested in working further with EPA to develop appropriate levels.

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