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November 21, 2016

Via Email

Melissa Fiffer  
U.S. Environmental Protection Agency  
ENERGY STAR® Appliance Program  
[appliances@energystar.gov](mailto:appliances@energystar.gov)

**Re: ENERGY STAR Product Specification Draft 2 for Clothes Washers Version 8.0 and Draft Test Method for Determining Residential Clothes Washer Cleaning Performance**

Dear Ms. Fiffer:

Thank you for the opportunity to comment on this draft. We appreciate the collaboration that continues to be encouraged by the Environmental Protection Agency (EPA) and shared between its stakeholders. As you know, our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise is a strong source of pride for our company.

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 positions on combination all-in-one washer/dryers, commercial clothes washers qualification criteria, the optional reporting of cleaning performance, the proposed and alternate cleaning performance test procedure, the connected criteria, and effective date. Our comments supplement those positions and address concerns we have where AHAM cannot take an industry position.**

**Definitions**

We agree with EPA's slight revision of the *Laundry Center* definition to remove "and is powered by a single electric power source."

**Scope - Combination All-in-One Washer-Dryers**

We continue to disagree with EPA's decision to exclude *Combination All-in-One Washer-Dryers* from the Version 8.0 specification, and to require measuring and reporting requirements for drying cycle water usage in a future Version 8.1 specification revision. As we mentioned in our Draft 1 comments, we question the value of measuring and reporting the data to EPA and/or consumers and cite the fact that water-cooled combination washer-dryers are a very small portion of the total U.S. and Canada washer market. We still believe that there are other factors more important to consumers in their purchase decision of these products, and that displaying this information to consumers may mislead them into thinking they are less environmentally-friendly than air-cooled models. Also, as we mentioned before, there are numerous consumer and environmental benefits when comparing water-cooled to air-cooled combination washer-dryers, such as possible energy savings from the dryers getting to higher internal temperatures and reduced heating and ventilation impacts.

If EPA decides to move forward with a requirement, despite the strong rationale against it, we are willing to partner with EPA and other stakeholders to develop a method for testing the water consumption of the drying portion of water-cooled combination washer-dryers. We agree with AHAM's recommendation to form an AHAM task force to lead the development of the procedure. This would be the most effective use of Department of Energy (DOE), EPA, and stakeholder resources.

#### **Qualification Criteria - Residential Clothes Washers**

We appreciate EPA's willingness to consider the new data presented by AHAM, and applaud EPA's decision to defer revision of residential top load washer levels. We believe that this decision is in the best interest of consumers and will maintain a broad selection of top load washers from multiple manufacturers in the U.S. market.

#### **Qualification Criteria - Commercial Clothes Washers**

We would like EPA to reconsider the decision about the continued qualification of commercial top load washers to ENERGY STAR. There is currently only one commercial top load model that meets the Version 7.1 specification. We do not believe that it is technically-feasible or cost-effective for a broad selection of commercial top load washers to meet the Version 7.1 or Version 8.0 proposed criteria, while meeting a consumer's expectations for ENERGY STAR products, which are energy/water savings without sacrificing exceptional product performance.

ENERGY STAR has done a tremendous job in advancing the commercial washer market towards higher efficiency, and we acknowledge and celebrate that success. We also need to admit that the program was so successful in advancing the market that there are no longer any technically-feasible and cost-effective means for commercial top load washers to meet ENERGY STAR without sacrificing product performance.

Whirlpool proposes a sunset of commercial top load washers from the Version 8.0 specification. This would allow for further energy/water efficiency gains in commercial front load washers, but recognizes those inherent challenges and technical limits to increasing energy/water efficiency in top load washers.

We do not believe that the correct approach to address these concerns would be to extend the Optional Reporting for Cleaning Performance to commercial washers. If there are serious concerns that manufacturers express about product performance at increasing levels of energy and water efficiency, the only viable solution for EPA at that point is a product sunset. Our concerns indicate that no further efficiency improvements are possible without performance degradation. An ENERGY STAR performance reporting requirement will not solve that concern if products can't achieve those levels in a cost-effective manner that even meets our own requirements for product performance.

In this way, we believe that at least one of ENERGY STAR’s guiding principles will not be met if EPA decides to continue allowing commercial top load washers qualification in the next specification: “product performance can be maintained or enhanced with increased energy efficiency.” Further, because only one manufacturer can meet current top load commercial levels and no manufacturers can meet the proposed top load commercial levels, we believe another ENERGY STAR guiding principle will be violated: “energy-efficiency can be achieved through one or more technologies such that qualifying products are broadly available and offered by more than one manufacturer.”

#### **Optional Reporting for Residential Clothes Washer Cleaning and Rinse Performance**

We continue to disagree with the proposed voluntary reporting requirement for residential clothes washer cleaning performance and the development of a cleaning test procedure. As we have commented before, we do not think that EPA has appropriately documented that current ENERGY STAR-certified washers are experiencing performance concerns, let alone washers meeting the proposed criteria. If EPA has data demonstrating these performance concerns, then they should provide it for stakeholder review and input. If such data does not exist, it is not appropriate for EPA to move forward with voluntary reporting requirements and the development of a test method.

We strongly agree that it is important for product performance to be maintained as products become more efficient. EPA should, however, rely on the expertise of DOE in their energy conservation standard rulemaking process, as well as manufacturer input, to determine if there may be a performance impact at higher levels of energy and water efficiency. If there is a known performance issue, EPA should develop levels that inherently account for performance, not setting levels beyond where washers can deliver consumer-acceptable performance at a reasonable payback period. Further, it is not the role of a government agency in the U.S. to set mandatory cleaning performance requirements.

#### **Proposed Cleaning Performance Test Procedure**

While we disagree with the development of a voluntary reporting requirement for cleaning performance, we will nonetheless provide feedback on the proposed cleaning performance test procedure. We share EPA’s and AHAM’s interest in developing a test procedure that is both repeatable and reproducible, with the least amount of manufacturer burden. There is no evidence, however, that the proposed test procedure has repeatability and reproducibility with low manufacturer burden.

We support AHAM’s comments documenting our concerns with repeatability, reproducibility, and expected manufacturer burden. As AHAM comments, we expect significant variation in the proposed test procedure, and for that reason, EPA and DOE should not continue pursuing this cleaning performance test method and voluntary reporting requirement.

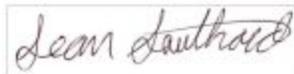
## Summary

We appreciate the opportunity to comment on the ENERGY STAR Draft 2 Version 8.0 Clothes Washer specification and 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 decision to not revise residential top load levels in the Version 8.0 specification.

We still have several remaining concerns in the Draft 2 proposal and cleaning performance test method proposal. Among our biggest concerns are the continued exclusion of combination all-in-one washer-dryers from the specification and proposed water testing requirement, the continued inclusion of commercial top load washers in the Version 8.0 specification, the proposal for an optional reporting requirement for washer performance, and the repeatability and reproducibility problems with the proposed cleaning performance test method. We request that EPA address these concerns in the next draft specification proposal.

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,



Sean Southard  
Manager, Regulatory Affairs  
Whirlpool Corporation