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June 27, 2014

Via E-Mail

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

Re: Additional Data Request for ENERGY STAR Version 7.0 Clothes Washer Specification and Low Level Activity during TALR

Dear Ms. Kaplan:

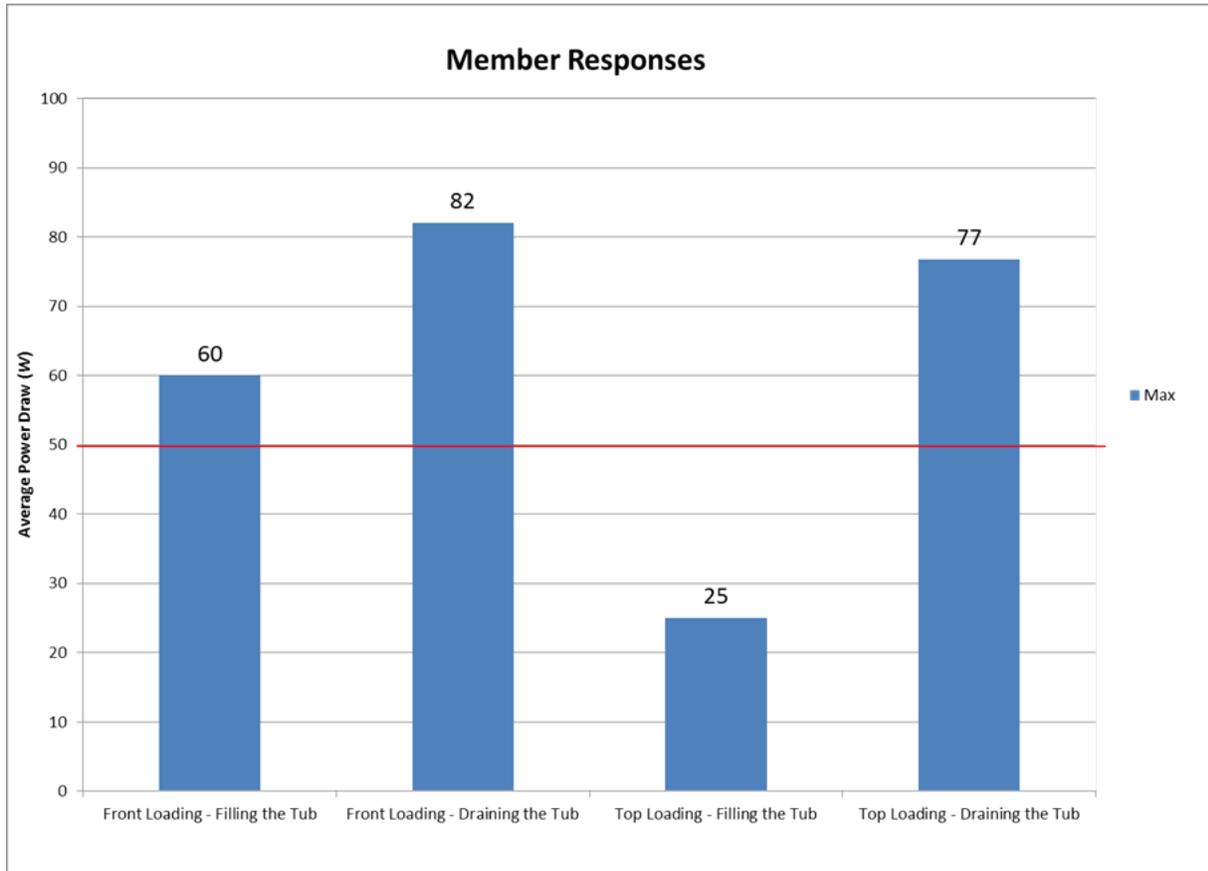
On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our response to additional questions proposed and data requested by ENERGY STAR on the Clothes Washer Specification and low level activity during temporary appliance load reduction.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports the Environmental Protection Agency (EPA) and Department of Energy in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement, as long as product performance can be maintained for the consumer. Therefore, as mentioned in AHAM's May 19, 2014 comments, AHAM supports the new EPA proposal to simplify the methodology for the Temporary Appliance Load Reduction (TALR) with slight modifications that will ensure performance is not interrupted.

As follow-up to AHAM's original comments, EPA has also asked whether low level activity can be accomplished for functions such as fill/drain tub, agitation and rotate the drum during the TALR period under the new EPA proposal.

AHAM has collected data regarding this request and the aggregated data supports the possibility of filling the tub as an activity that could continue to operate during a TALR event, however it is unlikely or not possible for the remaining functions (low level agitation, rotating the drum or draining the tub) to continue to operate during a TALR response under EPA's current proposal. The aggregated data is attached here for your review.



The data above represents the maximum of the average power draw of the data collected by AHAM for filling and draining the tub for both front loading and top loading clothes washers.

In addition, draining the tub is a critical functional activity, which should be allowed to continue in operation during a TALR response.

AHAM appreciates the opportunity to submit additional data for the ENERGY STAR Version 7.0 Clothes Washer Specification and is glad to discuss this issue further with EPA.

Best Regards,

Charlotte Skidmore
Director, Energy & Environmental Policy