
BSH HOME APPLIANCES CORPORATION

July 19, 2013

Submitted by E-Mail

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

**Re: ENERGY STAR Draft 2, Version 7.0 Clothes Washer Specification
and Preliminary Approach for Addressing Cleaning and Rinsing
Performance of Residential Clothes Washers**

Dear Ms Stevens:

Headquartered in Irvine, California, BSH Home Appliances Corporation is a subsidiary of Bosch and Siemens Hausgeräte GmbH, the world's third largest appliance manufacturer. BSH encompasses more than 42 factories in 49 countries, with more than 45,000 employees and sales in excess of \$12.6 billion (9.7 billion Euro). Our company's North American products include premium and luxury brands Bosch, Thermador and Gaggenau.

ENERGY STAR is an incentive to manufacturers to continuously improve the energy efficiency of their appliances. As the winner of the 2011, 2012 & 2013 ENERGY STAR Award for Sustained Excellence for appliance manufacturing, BSH strongly supports the ENERGY STAR program. We believe ENERGY STAR has made great strides in encouraging manufacturers to bring increasingly efficient products to market and there continues to be room for increased efficiency.

BSH appreciates the opportunity to submit to EPA comments regarding the current draft of the Clothes Washer Specification and we would like to address the effective date, the separate category for smaller clothes washers, the performance indicators and the connected allowance proposed in the current draft.

Effective Date & DOE TP J2

BSH supports the date of March 7th 2015 for the new criteria to take effect as this aligns with the new DOE testing standard J2 and its introduction of new metrics IMEF and IWF.

Separate Product Category for Clothes Washers $\leq 2.5 \text{ ft}^3$

BSH supports the introduction of this product category. This aligns with the separate criteria in the EPA's current Most Efficient 2013 program for Clothes Washers above and below 2.5 ft^3 drum

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1901 Main St, Suite 600
Irvine, CA 92614

volume. Smaller capacity washers generally achieve worse (I)MEFs and (I)WFs than washers with larger drum sizes as tested according to DOE J2 test procedures.

Reporting Requirements for Cleaning and Rinse Performance

BSH supports integrating washing/rinsing performance into future clothes washer specifications and test procedures. We believe performance criteria will protect the ENERGY STAR brand into the future and ensure consumers not only relate ENERGY STAR to energy savings but also to quality and performance. Performance metrics have been integrated in similar programs within other markets with success.

The customer expects their clothes and fabrics to be clean from soils and free from residuals of detergents as well as energy and water efficient. The introduction of a washing/rinsing metric will lead to a baseline of soil and detergent removal that the customer can depend on in making a comprehensive washer purchasing decision.

For the above reasons it is very important to link energy and water consumption with washing performance. To realize a performance based metric BSH recommends:

1. Use AHAM HLW-1 as a comprehensive standard test procedure for ALL residential clothes washers. HLW-1, when revised, will give the most accurate measurements for:
 - Energy usage
 - Water usage
 - Wash performance
 - Rinsing performance
 - Fabric wear performance
2. Use one TP for all testing. BSH does not support the use of two different test procedures, one for testing energy and water and the other for testing performance.
3. BSH does not support modifying DOE's current test procedure to determine washing and rinse scores. Until now there is little or no experience with this kind of test clothes using detergents and soiled test strips. It might take years to get a valid method whereas HLW-1 is already valid.
4. AHAM HLW-1 should replace DOE's J2 test procedure once complete.

Connected Allowance

We believe our previously submitted comments on the refrigeration specification directly apply to the 5% allowance within the clothes washer specification as well. We strongly oppose qualification credits for any specific technology.

To be clear, BSH is committed to supporting the integration of demand response technology into appliances without sacrificing energy efficiency. ENERGY STAR should take care to incentivize

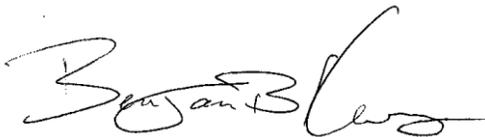
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manufacturers that integrate both connected technologies (including Smart Grid) and better efficiency into their products, not one over the other. We appreciate the EPA's efforts to find middle ground and turn the credit into "temporary". Without a definite sun-setting clause for the 5% credit, this becomes somewhat irrelevant. The credit is simply bad policy and undermines years of efforts to increase efficiency ratings.

We ask the EPA to revisit your intent to "jumpstart" the smart appliance market. You may now find that it does not need to be jump started and therefore the credit is no longer warranted.

We look forward to our ongoing work with the EPA and the ENERGY STAR program to further strengthen one of the government's most successful programs. The program is strong today and with the introduction of performance metrics and fair playing field for the compact laundry segment, we see an even brighter future. These methods have proven successful in other world markets and BSH looks forward to working with the ENERGY STAR team on these topics.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Benjamin King", written in a cursive style.

Benjamin King
Environmental Innovations & Standardization Manager
BSH Home Appliance Corporation