

REF NO.	Topic	Comment Summary	EPA Response
1	High Capacity CWs	One stakeholder commented that EPA's recent communication regarding capacity limits represented a change in the scope of the final Version 6.0 specification.	The December 11, 2012 letter was issued to clarify EPA's intention for the Version 6.0 ENERGY STAR Clothes Washers specification - that is to allow for certification of products up to 6.0 cubic feet, in alignment with the US DOE test method for these products. In its letter, EPA makes clear that it is harmonizing with the capacity limit in the DOE test method in the ENERGY STAR Version 6.0 specification.
2	High Capacity CWs	A commenter highlighted that under the V6.0 definition, coin-operated washers would fall under the definition of a commercial washer that is within scope for this specification. In addition, the commenter noted, other commercial laundry washing machines, or On Premises Laundry (OPL) could be included, such as laundries in hotels, gyms, health care facilities, etc. One stakeholder commented that in principle, there is no difference for most applications under "other commercial applications."	EPA's understanding is that OPL facilities could be considered under "other commercial applications" per the definition. However, the product must be able to be tested per the DOE clothes washer test procedure, which currently only allows units up to 6.0 cubic feet to be tested per Table 5.1.
3	High Capacity CWs	One stakeholder suggested that an extension of the container volumes included in Appendix J1, Table 5.1 of the DOE clothes washer test procedure is preferable to establishing a capacity limit for ENERGY STAR that he believes does not capture machines in use in coin-operated laundries and other commercial laundry. This stakeholder offered that with an amended DOE clothes washer test procedure for units up to 12 cu-ft, EPA could raise the ENERGY STAR upper limit to 12 cu-ft. The stakeholder added that a smaller increase would also be preferable to a 6 cu-ft. limit. Lastly this stakeholder suggested that waivers for large-capacity clothes washers could act as a bridge while standards are updated.	DOE does not believe that extrapolating container volumes past 6.0 cubic feet in the current DOE clothes washer test procedure is a viable pathway forward for high capacity commercial clothes washer models. EPA will scope higher capacity clothes washers to determine the energy savings potential of this product category. EPA will work with stakeholders to collect necessary and relevant information. A key component of developing a new ENERGY STAR specification for larger capacity commercial clothes washers will be the availability of an appropriate test procedure.
4	High Capacity CWs	A stakeholder offered that a new Cenelec standard for performance of commercial washers is under development and does not consider limits to commercial washers.	EPA and DOE will review the Cenelec standard and test procedure as part of a scoping process for a ENERGY STAR specification for larger commercial clothes washers. Stakeholders are encouraged to send DOE any additional information on the Cenelec standard or any other potentially relevant test procedures. For clothes washers covered by DOE's Appliance Standards Program, ENERGY STAR uses the Federal testing procedures to harmonize with DOE's regulatory program and to reduce burden on manufacturers. Any consideration of alternative methods of test for those products would need to be submitted to DOE as part of the rulemaking process.
5	High Capacity CWs	A stakeholder commented that EPA should align its definition, along with its test method, for commercial clothes washers with those used by DOE in the federal minimum standards to avoid possible confusion.	EPA has aligned with DOE definitions and testing requirements. EPA is amending the Section 2, Scope of the specification to indicate that units up to 6.0 cubic feet may be eligible for ENERGY STAR qualification. EPA is able to expand its scope for the purposes of ENERGY STAR beyond that covered by DOE as long as a viable test method for the expanded scope is available. Since larger commercial washers can offer both high efficiency and the opportunity for end-users to run larger and thus fewer loads, EPA sees consumer value in ENERGY STAR highlighting larger products. In consultation with DOE, EPA understands that the current DOE clothes washer test procedure is viable for evaluating larger capacity clothes washers up to 6.0 cu-ft.
6	High Capacity CWs	A stakeholder noted that designs for larger units may vary from those of smaller units that are designed to meet DOE's minimum efficiency standards. The stakeholder encouraged EPA to contact individual manufacturers to further discuss the potential impact of increasing the capacity limit beyond those provided for in the DOE definition. The stakeholder also called on EPA to cite DOE's definition in the ENERGY STAR specification.	As part of the V6.0 specification development process, EPA vetted the capacity limit for commercial clothes washers to include possible impacts of increasing the capacity limit beyond those provided for in the DOE scope. EPA considered all stakeholder feedback, and after consultation with DOE, determined that the scope of the program may allow for commercial washers with capacities of up to 6.0 cubic feet.