

Summary and Response to Stakeholder Comments Received on the
ENERGY STAR Program Version 7.0 Clothes Washers - Demand Response Criteria Proposal

REF NO.	Topic	Summary of Comments	EPA Responses
1	Applicable Cycle Settings for Temporary Appliance Load Reduction (TALR)	<p>One stakeholder requested that EPA exempt wool cycles from TALR response criteria, surmising that a reduction in agitation may result in shrinkage of wool clothing.</p> <p>Another commenter requested exclusion of sanitization and allergen reduction cycles from TALR response criteria. These cycles are NSF International certified - interruption is likely to either result in not successfully completing the NSF requirements or increased clothing stress and increased energy use if the high temperature operation is restarted.</p>	<p>In the final draft proposal, EPA has elected not to exempt wool cycles from TALR response criteria. EPA will reconsider this decision in a future specification revision, if stakeholders are able to provide test data that corroborates washable wool clothing shrinkage to TALR responsiveness during wool cycles.</p> <p>In the final draft proposal, EPA has exempted NSF-certified sanitization and allergen reduction cycles from TALR response criteria. In doing so, EPA strives to ensure consumer expectations are not impacted by the product's smart grid functionality.</p>
2	Defining Temporary Appliance Load Reduction	<p>One stakeholder provided worst-case average power draw data for wash tub fill and drain operations for front and top-loading clothes washers. This stakeholder indicated that draining the tub is a critical function that should be allowed during a TALR response. Maximum average power draw for the data collected by this stakeholder ranged from 25-watts (top-loader tub fill) to 82-watts (front-loader tub drain).</p>	<p>In the final draft proposal, EPA continues to propose that the clothes washer not exceed a 50-watt average power draw for the duration of the response period. Stakeholder- submitted data indicates a worst-case 82-watt average power draw for the tub-drain operation. Based on the testing DOE has conducted on clothes washers, DOE has informed EPA that as a typical worst-case for an ENERGY STAR rated clothes washer, full tub draining could be performed in under 5 minutes. Accordingly, it should be possible for clothes washers to completely drain the tub while complying with a 50 watt average power draw limit for the duration of a 10 minute TALR response.</p>