



GE Appliances & Lighting

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January 17, 2014
Via E-Mail

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

Re: ENERGY STAR Final Draft, Version 7.0 Clothes Washer Specification

Dear Ms. Stevens:

On behalf of GE Appliances (GE), I am submitting these comments on the ENERGY STAR Final Draft, Version 7.0 Clothes Washer Specification. GE has a long commitment to energy efficiency and the ENERGY STAR Program. A partner since 1991 and past Sustained Excellence honoree, we believe our views on the program's direction should be accorded significant weight. We appreciate the opportunity to provide comments as EPA prepares this new specification as part of our responsibility to ensure that the practical benefits and burdens of the proposal are considered.

As a member of the Association of Home Appliance Manufacturers (AHAM), GE adopts fully and incorporates herein, the January 17 comments filed by AHAM. But GE wishes to expand on those comments by providing this additional information.

I. EPA has failed to articulate a rationale for failing to adhere to the product definitions and product classes standard to the industry.

GE urges EPA to use product definitions and criteria that are consistent with regulations issued by the Department of Energy (DOE). These are the regulations that are foundational to the appliances industry's product development plans. Most manufacturers, especially full-line manufacturers who produce the largest and broadest range of product offerings, do not have ENERGY STAR-dedicated production facilities or production lines. ENERGY STAR-qualified models are manufactured on the same equipment where non-qualified models are produced. Adding special—and usually more costly—components helps achieve the required greater efficiency. In creating different or eliminating existing product classes EPA demonstrates the extent of its disconnection from at least 40 years of industry product development and consumer preferences. Thus, EPA's proposal in version 7.0, to define a new

commercial clothes washer, limit the volume of clothes washers to less than 6 cu. ft. and create a new class of compact washers with 1.6 to 2.5 cu. ft., ignores the extensive analysis that DOE has done to set efficiency standards that balance the goal of achieving national energy savings in a way that nonetheless preserves product functionality, consumer choice and impact on manufacturers' ability to retain the financial vitality necessary to continue to make products and grow the economy. While it is true that EPA is not bound by the provisions of the National Appliance Energy Conservation Act of 1987 (NAECA), it should honor the clear intent of Congress that these principles govern the government's energy efficiency efforts. But in version 7.0, EPA dismisses industry practice, DOE's analytical work and Congressional intent. All without explanation.

For the above reasons, GE urges EPA to abandon the proposal to redefine commercial and residential clothes washers and create a new class of compact washers.

II. GE opposes inclusion of non-energy related performance requirements, including clothes washer cleaning and rinse performance.

Consumers do not need EPA to help them shop for products clothes washers that clean and rinse their clothes. Independent product information providers and reviewers continue to proliferate. Consumers no longer rely on store salesmen (if they can find one) for product information: They come to the store after doing their research as any retailer will confirm.

This is another area for EPA has failed to demonstrate the need for its involvement. The Consumers Union (CU) ratings cited by EPA do not even rate the high-efficiency models as having poor cleaning or rinsing. In any event, reading CU ratings is not the quality analysis that would justify imposing the cost that extensive testing would require. Cleaning ability is a principal CTQ on which manufacturers compete. And they invest heavily to satisfy consumers even as they achieve energy and water efficiency standards.

EPA's focus on product performance should be limited to ensuring that its energy specifications are not so aggressive as to reduce effective performance.

III. Conclusion

GE urges EPA to align product specification definitions with the product definitions followed by industry practice and as defined in DOE regulations of covered products. We also oppose inclusion of non-energy performance requirements such as cleaning and rinsing ability in the ENERGY STAR clothes washer version 7.0 specification because the market and independent information sources serve consumers' needs. Please contact me if you would like additional information.

Sincerely

