



## GE Appliances & Lighting

**Earl F. Jones**

Senior Counsel – Regulatory Compliance

Appliance Park, AP2-225  
Louisville, KY 40225

T 502 452 3164  
F 502 452 0347  
earl.jones@ge.com

April 12, 2013

Katharine Kaplan  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
[appliances@energystar.gov](mailto:appliances@energystar.gov)

Re: ENERGY STAR Program Requirements, Product Specification for Residential Refrigerators and Freezers Final Draft, Version 5.0 and Final Draft Test Method to Validate Demand Response

Dear Ms. Kaplan:

These are filed on behalf of GE Appliances, an operating component of General Electric Co. ("GE"), and a domestic manufacturer of major appliances, including, as relevant here, refrigerators and refrigerator-freezers. GE has been an ENERGY STAR partner since 1991 and, over the years, has been recognized by EPA through its partner award program for its commitment of significant product investment, innovation and marketing support of the ENERGY STAR Program.

GE is a member of the Associations of Home Appliance manufacturers ("AHAM") and supports the comments filed by AHAM in the *above* matter. However, given the importance of the issue raised by the Product Specification for Residential Refrigerators and Freezers Final Draft, Version 5.0 as related to the proposed effective date of the specification, GE is compelled to submit these additional comments.

A common 2014 refrigerator ENERGY STAR and DOE *effective* date makes common sense. EPA's proposal to forego aligning the *effective* date of the ENERGY STAR Refrigerator specification with the September *effective* date of the new DOE energy standard and, instead, to accelerate the effective date to March would impose special hardships on U.S. manufacturers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Earl F. Jones', with a horizontal line extending to the right.