

For over 110 years Miele, the world's largest family owned and operated appliance company, has been producing innovative, energy and water efficient products that lead the industry in terms of quality, durability, performance and design. All Miele models of clothes washers sold in the United State to date have qualified for the Energy Star Program. Current models of Miele Clothes Washers received ENERGY STAR Most Efficient 2012 designation

In keeping with the Miele philosophy of "Immer Besser," forever better, Miele, has developed and will introduce a new model of clothes washer in early 2013 that is an improvement of the current ENERGY STAR Most Efficient 2012 model in terms of energy and water efficiency without compromising wash performance. The new model has been rated at 1.98 cuft, 110kWh/year, MEF=2.59, WF 3.84. Using the proposed criteria in V7.0 (MEF2.6,  $WF \leq 3.7$ ), Miele would no longer be able to qualify for ENERGY STAR designation. It is difficult to comprehend that even with substantial investment and improvement in design of an already designated top performer that Miele will no longer be able to qualify for ENERGY STAR at all.

Better efficiency ratios are attainable across all configurations and ENERGY STAR should be applauded in aiding the transition of the market to product offerings with higher efficiencies, however recent technological advancements and increasing measured drum volume by clothes washer manufacturers have not taken wash performance into account.

- Consumers choose type and size of clothes washer to suit their needs. With front loading high efficiency washers, the need to separate loads by whites, different color and fabric type contribute to the possibility that the DOE minimum load of 3 pounds for all drum volumes may be excessive. Front loading HE clothes washers using small quantities of water resulting in elevated concentrations of specialized HE detergent require consumers to separate larger loads by color, whites and fabric type into smaller loads to avoid cross running of fabric dyes.
- High efficiency washers that are expected to produce excellent wash results (clean clothes) to the consumer should not be stuffed to the limit with mixed loads so that they may provide test results in order to qualify for ENERGY STAR. This is not representative of actual consumer usage.
- Contemporary laundry practices in the United States must be incorporated into the test procedure and criteria for the size of a minimum laundry load, the size of an average load, and the frequency distribution of various laundry loads should be reconsidered. The adequacy of the 3 pound minimum load sizes for new larger machines with adaptive fill has not been investigated with respect to usage patterns of smaller households.
- The DOE test procedure is not always representative of current consumer practices and should be updated to reflect practical consumer usage assumptions originally formulated in the era of the top loader washer.
- Clothes washers with smaller drum volume less than 2 cubic feet are targeted at urban and smaller sized households. Urban dwellers, empty nesters and single occupancy households do not have the same clothes washer needs or habits of a larger family.
- Measured drum volume remains representative of the term capacity. Capacity has not been defined in terms of wash performance by the DOE. Wash performance directly influences consumer usage patterns. The proposed 7.0 specification relies on Consumer Union to express a performance metric. Testing provided by Consumer Union is proprietary and laboratory information on reproducibility or repeatable has not been published. It has not been proven as an accurate substitute for consensus standards of performance.

- Currently there are no available Energy Star qualifying models fewer than 2.1 cubic feet that would meet the proposed 7.0 specification. Consumers with usage patterns and space limitations that would be more suited towards smaller clothes washers will have extremely limited choice in purchasing Energy Star products.
- Visual representation of a 2 cubic foot clothes washer that does not qualify positioned next to a 6 cubic foot clothes washer that does qualify for Energy Star will cause consumers to think more critically about the utility of different sized washers and the credibility of the Energy Star Program in general.

The current ENERGY STAR Most Efficient designation uses a 2.5 cubic feet to distinguish qualification levels. Absent of DOE test procedures to determine the effects of contemporary laundry practices in the United States on energy and water consumption, Miele Inc. respectfully requests that greater consideration be given to clothes washers that fall within the lower limit of measured drum volume.

Sincerely,

Steve Polinski

**Steve Polinski**  
Regulatory Affairs Marketing

