



NRDC Comments on EPA ENERGY STAR's Final Draft Version 7.0 Specification for Residential Clothes Washers

January 17, 2014

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's Final Draft Version 7.0 Specification for Residential Clothes Washers.

NRDC is pleased that EPA is updating the clothes washer specification and generally supports the proposed criteria. NRDC supports EPA's effort to update the ENERGY STAR specification for clothes washers given the large percentage of models that qualify for ENERGY STAR and the availability of higher efficiency products on the market. NRDC supports the efficiency levels in the proposed specification, which will provide cost-effective energy and water savings to consumers.

NRDC supports the creation a separate category for washing machines with capacities smaller than 2.5 cubic feet and supports the proposed specification. As stated in our previous comments, NRDC supports the inclusion of a separate category for small washing machines, given that they provide a unique utility for consumers with space-constraints and would not otherwise qualify under the proposed criteria.

NRDC continues to question whether separate product classes for front and top loaders are justified. As discussed in our previous comments, Consumer Reports data indicates that there are many front loaders with comparable cycle times to top loaders and therefore we question the need for separate product categories. EPA acknowledges this data in the Final Draft specification, but states that nearly 2/3 of sales in 2012 were top loaders which justifies a separate product category. We disagree with this conclusion that sales volume alone justifies the need for a separate product category and urge EPA to consider a single product category for top and front loaders in future clothes washer specification updates.

NRDC supports the exclusion of combination washer-dryers from the scope of the proposed specification. As discussed in previous comments, NRDC supports the exclusion of combination washer-dryers from the scope of coverage at this time. These machines can use significantly more water than a separate washer and dryer and until test methods are developed to measure and account for this water use they should not be included in ENERGY STAR.

NRDC continues to support the development of the cleanability and rinse performance tests and the inclusion of a reporting requirement for the results of these tests. As stated previously, NRDC strongly supports the development of a cleanability test to ensure that all new Energy Star products continue to offer high performance of their essential functions. We continue to urge EPA to make the requirement applicable to all models regardless of certification date to avoid the possibility of gaming through early certification.

NRDC urges EPA to maintain the proposed effective date of March 7, 2015. Given the high percentage of models on the market that qualify for the ENERGY STAR, the specification should be updated as soon as possible to deliver the greatest benefits to consumers. The draft criteria have not changed significantly since the Draft 2 specification in July 2013 and the proposed effective date is still more than a year away, giving manufacturers sufficient time to prepare for the revised specification. This date also aligns with the effective date of the updated DOE standards for clothes washers. Given this, we urge EPA to maintain its proposed effective date of March 7, 2015.

Thank you for the opportunity to submit these comments.

Sincerely,



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