



NRDC Comments on EPA ENERGY STAR's Draft 2 Version 7.0 Specification for Residential Clothes Washers

July 10, 2013

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 Draft 2 Version 7.0 Specification for Residential Clothes Washers.

NRDC is pleased that EPA is updating the clothes washer specification due to the high market penetration of Energy Star clothes washers. EPA estimates that ENERGY STAR clothes washers reached a 60 percent market share in 2011. This percentage is likely higher today and the certified product database indicates the availability of much higher efficiency clothes washers on the market than the current ENERGY STAR specification. Given this high market share and the availability of more efficient products, NRDC strongly supports the revision of this ENERGY STAR specification.

NRDC supports the creation a separate category for washing machines with capacities smaller than 2.5 cubic feet and supports the proposed specification. NRDC commented on the Version 7.0 Draft 1.0 specification that EPA should create a separate category for smaller washing machines, given that they provide a unique utility for consumers with space-constraints and that no small machines would have met the proposed Draft 1.0 specification. We appreciate that EPA has taken these comments into account and support the draft specification for smaller washing machines as proposed.

NRDC questions whether there are differences in cycle time for front and top loaders that validate the need for separate product categories. Based on NRDC's analysis of recent Consumer Reports washing machine ratings, it is not clear that a separation of product categories based on cycle time is justified. While the average cycle time for the Consumer Reports ranked top loaders is shorter than that for Consumer Reports ranked front loaders, there are many front loaders with cycle times that are comparable to the fastest top loaders. Specifically there are several front loaders with 45 minute cycle times, which is close to the fastest cycle time for top loaders. For both types of machines, there is a range of cycle times (notably, the longest reported cycle time is a top loader). Before finalizing the division of the product category on this basis, EPA should consider the range of cycle times for models that meet current and proposed Energy Star criteria and determine whether a single product class would significantly limit consumer choice of machines with average or less-than-average cycle times.

However, if EPA chooses to keep two categories for front and top loaders, we support the criteria as proposed and understand EPA's desire to set a specification that continues to

encompass top loaders but also recognizes the greater efficiencies available in front loaders.

NRDC is pleased to see that DOE and EPA are developing a cleanability test and recommends that manufacturers of all models eligible for the Energy Star label be required to report test results once the test procedure is adopted. 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. NRDC also supports EPA's decision to include a reporting requirement only for the Version 7.0 specification, given the time constraints. However, we urge that this reporting requirement apply to all models once the test procedure is finalized, regardless of when individual models are certified to the Version 7.0 performance specification. Allowing manufacturers to avoid this reporting requirement through earlier certification would put other manufacturers at a disadvantage and could obscure poorly performance of machines carrying the Energy Star label. Consumers will be reassured by public access to this data for all Energy Star labeled washing machines, and NRDC urges EPA to require reporting of cleanability test results for all certified washing machines once the test procedure is finalized.

NRDC supports the inclusion of a five percent energy credit for connected clothes washers, but does not support the use of cloud based systems as the sole means of connection. As indicated in our comments on Draft 1.0, NRDC supports the inclusion of a five percent energy credit in the Version 7.0 Energy Star specification for clothes washers that meet the connected criteria. NRDC supports the comments submitted by the Consortium for Energy Efficiency on the technical specifications for the connected criteria and urges EPA to require the use of a connection path that does not rely on the customer's internet connection and a cloud based system. Ensuring that a utility can connect directly with the appliance will better enable the utilization of connected features in demand respond and load management programs, helping to achieve the intended benefits of the connected credit.

Thank you for the opportunity to submit these comments.

Sincerely,



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