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January 24, 2014

Via Email

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

Re: ENERGY STAR Product Specification Supplemental Proposal for Clothes Dryers Version 1.0

Dear Ms. Stevens:

Thank you for the opportunity to comment on this draft. We appreciate the collaboration that continues to be encouraged by the Environmental Protection Agency (EPA) and shared between its stakeholders. As you know, our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise is a strong source of pride for our company.

As a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the comments they submitted (under separate cover) on this supplemental proposal. **Please be advised that we support and echo the positions taken by AHAM; particularly the positions on the reference to the Appendix D2 test procedure, the introduction of a maximum drying time, and the “manufacturer-defined fastest cycle” testing and reporting requirement. Moreover, we hope that our collective comments can steer EPA towards resolving these issues, rather than continuing on this path where each subsequent proposal deviates further from a program that is viable for manufacturers.**

Appendix D2

The reference to the optional Appendix D2 test procedure in the clothes dryer specification also creates a host of problems for manufacturers and more importantly, our consumers. The reality is that consumers will ultimately be confused when products are rated under two test procedures within a single product category, especially when it is for an extended period of time without a transition planned to eventually use a single test procedure. Consumers are very astute today and many perform their due diligence prior to their appliance purchase. EPA recognized this consumer behavior of searching product energy efficiency when the ENERGY STAR *Most Efficient* Program was created. Whether it is the Department of Energy certification database, manufacturer/retailer websites, the ENERGY STAR website, product review pages, or checking the Federal Trade Commission’s website to see if there is an EnergyGuide label, the average consumer tries to get as much information about a product before they buy and will not understand the different reported values they will see for ENERGY STAR vs. non-ENERGY STAR dryer models. Even worse, and more likely, they could make the wrong purchase decision by thinking that a dryer with a higher CEF tested under Appendix D1 is more efficient than the

dryer with a lower CEF tested under Appendix D2. This is a no-win situation for the ENERGY STAR brand, the environment, manufacturers, retailers, and consumers.

Additionally, as we have previously commented to EPA, we do not disagree with EPA's assessment that Appendix D2 better reflects the energy consumption for the set of consumers that use automatic termination cycles. However, a test procedure with automatic termination may not represent the energy use for a large number of consumers who prefer timed dry, which may be better represented by Appendix D1. There are varying data points on how often consumers use timed dry. One major manufacturer publicly stated that 54% of consumers regularly use timed dry over automatic termination cycles. Regardless of which test procedure is more representative of consumers that use automatic termination or timed dry, the ends (automatic termination) do not justify the means (referencing the optional Appendix D2 test procedure), for the reasons we have previously commented to EPA.

To that end, a very logical starting point for a new ENERGY STAR specification would be near-term efficiency gains from existing technologies and a reference to the mandatory Appendix D1 test procedure until the optional Appendix D2 test procedure is required for federal standards compliance.

Effective Date

We appreciate EPA's recognition of our concerns that meeting the requirements in the Draft 2 proposal in 2014, especially with this Appendix D2 test procedure, may be challenging. While we advocate that EPA use Appendix D1 for Version 1.0 and align the effective date with the new federal standards, we applaud EPA for not proposing a 2014 effective date.

Maximum Drying Time and "Manufacturer-Defined Fastest Cycle"

We strongly agree with AHAM's comments that EPA lacks sufficient data to support the proposed maximum drying time in the supplemental proposal, and that the introduction of the manufacturer-defined fastest cycle testing and reporting requirement creates costly manufacturer burden without the necessary data and analysis to justify inclusion in the specification.

Qualifying multiple models further compounds this burden. Not only are we not currently set up to handle this enormous increase in testing burden, but this will affect both the speed in which we qualify models and the quantity of models that we can qualify. Furthermore, every incremental testing burden detracts from our investments towards creating more efficient products, investments in marketing these ENERGY STAR products, educating consumers on dryer energy efficiency, etc.

To that end, we do not think that this additional burden justifies the inclusion in the specification. However, if EPA does decide to pursue this costly burden, despite our concerns, we would need EPA to provide additional clarification on the definition of this "manufacturer-defined fastest cycle." For example, is this the fastest cycle to dry the DOE test load, the highest temperature setting, or something else? It is too open to interpretation now, and EPA may find multiple interpretations from manufacturers, thus cancelling any intended benefit from this requirement.

A Program that Works for All Stakeholders

Based on concerns from advocacy groups, EPA has created additional manufacturer cost burden in the form of a maximum drying time and an additional testing and reporting requirement, while keeping the levels stringent and referencing the optional Appendix D2 test procedure. As we stated earlier, we applaud EPA for addressing the effective date, but this specification has a long way to go before the vast majority of the industry can buy into an ENERGY STAR clothes dryer program. We hope that EPA considers our comments and makes the specification viable for most appliance manufacturers.

Thank you again for your consideration and we look forward to continued collaboration. As always, please do not hesitate to ask us for any clarifications on these comments.

Sincerely,

A handwritten signature in cursive script that reads "Sean Southard".

Sean Southard
Government Relations