



ADMINISTRATIVE CENTER • 2000 N. M63 – MD 3502 • BENTON HARBOR, MI 49022 • 269.923.4646

December 6, 2013

Via Email

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

Re: ENERGY STAR Room Air Conditioner Version 4.0 Framework Document

Dear Ms. Stevens:

Thank you for the opportunity to comment on ENERGY STAR's framework document for Version 4.0 of the ENERGY STAR Room Air Conditioner specification. 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 framework document. **Please be advised that we strongly support and echo the positions taken by AHAM, particularly the comments that address EPA's interest in new, low-GWP refrigerants.**

We strongly believe that EPA's continued pursuit of low-GWP refrigerant requirements in ENERGY STAR product specifications detracts from the strategic vision for the ENERGY STAR program, which is to reduce greenhouse gas emissions by removing barriers in the market that deter consumers and others from purchasing the most energy-efficient product model that otherwise meet their needs. Requirements for low-GWP refrigerants would be a restrictive design element for manufacturers. Market forces should and will dictate whether manufacturers decide to incorporate design elements like low-GWP refrigerants (and blowing agents) in their products. Even after EPA decided not to pursue low-GWP requirements in the Version 5.0 Residential Refrigerator and Freezer specification, we began the transition to incorporate HFO blowing agents (an EPA SNAP-approved class of blowing agents) into our refrigerators. Strong market forces, including a desire to be the first refrigerator manufacturer in the U.S. to incorporate these highly-efficient and low-GWP blowing agents, motivated us to make this decision. Furthermore, ENERGY STAR cannot get ahead of the SNAP-approval process. There are few, if any, low-GWP refrigerants currently approved for use in room air conditioners in the U.S.

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