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August 29, 2011

Via Email

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
<mailto:appliances@energystar.gov>

Re: ENERGY STAR® Product Specification for Commercial Clothes Washers Draft 1 Version 6.0

Dear Ms. Stevens,

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 matter. **Please be advised that we support and echo the positions taken by AHAM regarding definitions, testing requirements and the Version 6.0 effective date of January 8, 2013.**

Additionally, it is important to note that given AHAM's position as an industry organization, they cannot offer comments either for or against the criteria levels proposed by the EPA for commercial clothes washers. They also did not have industry consensus on the definition of a commercial clothes washer and whether it is appropriate to include a cleaning and rinse performance criteria or to sunset the specification with regard to commercial clothes washers. Detailed in the subsequent section of this document are our positions on these three subjects, which are as follows:

- 1) Whirlpool Corporation supports the proposed ENERGY STAR commercial clothes washer criteria level of a Modified Energy Factor (MEF) ≥ 2.2 and a Water Factor (WF) ≤ 4.5 for V6.0.
- 2) Whirlpool Corporation supports the harmonization of the definition of a "commercial clothes washer" with the DOE definition, including the upper capacity limit of 3.5 cubic feet for horizontal-axis machines and the 4.0 cubic foot limit for vertical-axis machines.
- 3) Whirlpool Corporation supports the continuation of the ENERGY STAR program for commercial clothes washers in any possible revisions that take place *after* version V6.0, so long as there is a cleaning and rinse performance criteria added to the specification.

Commercial Clothes Washer Definition

EPA proposed to harmonize the definition of “commercial clothes washer” with DOE’s definition of that term. EPA also noted that the DOE definition includes upper capacity limits that were not previously included by EPA in the ENERGY STAR definition. It is critical that definitions be uniform among federal agencies in order to provide consistency and clarity to stakeholders. Therefore, Whirlpool Corporation supports the harmonization of the definition of “commercial clothes washer” with the DOE definition, including the upper capacity limit of 3.5 cubic feet for horizontal-axis machines and the 4.0 cubic foot limit for vertical-axis machines.

Proposed criteria level and a future cleaning and rinse requirement

We feel that the proposed V6.0 criteria level criteria level of a MEF ≥ 2.2 and a WF ≤ 4.5 are as aggressive as the criteria levels can go without violating the ENERGY STAR Guiding Principle of “product performance being maintained or enhanced with increased efficiency”. Thus, a cleaning and rinse performance requirement must coincide with any future energy and water levels that exceed those put forth in V6.0. This is due to the fact that the nature of consumer behavior associated with commercial clothes washers generally involves the overloading of machines and the use of excessive amounts of detergent, which often leads to consumers compensating for this improper use of the clothes washer by selecting more intensive water and energy cycles. Implementing unprecedented ENERGY STAR levels that exceed those proposed in V6.0 without a clean and rinse performance factor will further reinforce this negative behavior, thereby negating any net efficiency and monetary benefits the trade was expecting when they invested in the purchase of their ENERGY STAR commercial clothes washer.

Moreover, without a performance test, some manufacturers will perpetuate these consumer practices by gaming and proliferating commercial clothes washers that do not clean and rinse clothes in the name of meeting these qualification levels. That will only lead to further compensating consumer behavior and ENERGY STAR will fail to get their targeted environmental benefits.

Therefore, we are suggesting that the Draft V6.0 ENERGY STAR commercial clothes washer criteria levels be executed as proposed by the EPA and a cleaning and rinse performance score be introduced with any revision beyond V6.0. As AHAM noted in their comments, at this time there is not a test procedure that measures both cleaning and rinse performance. However, AHAM is exploring such a standard, but cannot be sure of a completion date. Whirlpool will work with AHAM to assure development of such a consumer relevant standard on a timely basis.

Thank you for your consideration and we look forward to continued collaboration with the EPA going forward. Our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise is a strong source of pride for Whirlpool Corporation as a leader in designing, producing and marketing ENERGY STAR qualified appliances.

Sincerely,

A handwritten signature in black ink that reads "Nick Gillespie". The signature is written in a cursive, flowing style.

Nick Gillespie
Government Relations Senior Specialist