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August 29, 2011

Via E-Mail

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

Re: ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Draft 1, Version 6.0 (Commercial Clothes Washers)

Dear Ms. Stevens:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Draft 1, Version 6.0 (Commercial Clothes Washers).

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports EPA and DOE in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement, as long as product performance can be maintained for the consumer. Should EPA further revise the specification for commercial clothes washers in a future revision, it should, at that time, consider whether sunsetting the specification or including cleaning and rinse performance is appropriate. AHAM supports the proposed effective date for the current revision of January 8, 2013, which is aligned with the date on which compliance is required with the new Federal energy efficiency standard for commercial clothes washers.

## I. Definitions

### A. Basic Model

EPA proposed to revise the definition of “basic model” in order to harmonize with DOE’s recently revised definition. AHAM supports that change. It is critical that definitions among Federal agencies be identical in order to provide clarity and consistency to stakeholders. AHAM notes that the new definition can now be found in 10 C.F.R. 430.2, and that that is the best citation for the definition (not the Federal Register notice cited by EPA in the proposed specification revision).

### B. Modified Energy Factor and Water Factor

The definitions of “modified energy factor” and “water factor,” which EPA does not appear to propose to change, are not identical to DOE’s definitions of those terms. AHAM suggests the following minor editorial changes to ensure that the definitions are identical (redlines show changes that need to be made to EPA’s definition to make it identical to DOE’s):

Modified Energy Factor: Modified Energy Factor (“MEF”) is the present energy efficiency measure for all clothes washers. MEF is the quotient of the cubic foot (or liter) capacity of the clothes container divided by the total clothes washer energy consumption per cycle, with such energy consumption expressed as the sum of the machine electrical energy consumption, the hot water energy consumption, and the energy required for removal of the remaining moisture in the wash load. The units are cubic feet per kilowatt-hour (kWh) per cycle (ft<sup>3</sup>/kWh/cycle) (or liters per kilowatt-hour per cycle). The higher the value, the more efficient the clothes washer.

Water Factor: Water Factor (“WF”) is the present water efficiency calculation that allows the comparison of clothes washer water consumption independent of clothes washer capacity. The term is expressed as gallons per cycle per cubic feet (or liter per cycle per liter). WF is the quotient of the total weighted per-cycle water consumption divided by the cubic foot (or liter) capacity of the clothes washer. The lower the value, the more efficient the clothes washer.

## II. Qualification Criteria

### A. Cleaning Performance

EPA sought comment on the possibility of incorporating a cleaning and/or rinse performance requirement into the ENERGY STAR clothes washer specification through a *future* specification revision process. EPA also sought comment on potentially applicable industry test method(s) and their status. EPA noted that it does not intend to consider cleaning and/or rinse performance requirements during the Version 6.0 revision process.

AHAM supports EPA and DOE in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement, as long as product performance can

be maintained for the consumer. AHAM suggests that, if EPA seeks to revise the clothes washer specification in the future with regard to commercial clothes washers, it review, at that time, whether it is appropriate to include cleaning and rinse performance or to sunset the specification with regard to commercial clothes washers. At this time, there is not a test procedure that measures both cleaning and rinse performance.

B. Model Numbers

EPA proposed to revise the model number language to clarify that model numbers used for ENERGY STAR qualified product submissions should be equivalent to those used in compliance reports submitted to FTC and DOE. AHAM supports the proposed revision.

**III. Test Requirements**

EPA proposed to reference DOE's sampling procedures for the purposes of qualification testing. AHAM strongly supports the proposal to reference DOE's sampling procedures. Allowing manufacturers to leverage testing performed for determining compliance with minimum efficiency standards is consistent with following the DOE test procedure requirements and is the most efficient and accurate approach.

**IV. Effective Date**

EPA proposed that Version 6.0 of the specification containing new criteria for commercial clothes washers be effective on January 8, 2013. AHAM supports the effective date of January 8, 2013, which aligns with the date on which compliance with the new Federal energy efficiency standard for commercial clothes washers will be required.

AHAM appreciates the opportunity to submit these comments on ENERGY STAR's proposal regarding Advancing ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Draft 1, Version 6.0 (Commercial Clothes Washers). We would be glad to discuss this matter further should you request.

Best Regards,



Jennifer Cleary  
Director, Regulatory Affairs