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November 28, 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, Final Draft, 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, Final Draft, 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 are also 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. AHAM is willing to work with EPA when it decides to consider whether it is appropriate to include cleaning and rinse performance criteria when the specification is next reviewed for possible revision. This is an important product for this program now and into the future. AHAM also continues its support of the proposed effective date of January 8, 2013, which is aligned with the date on which compliance is required with the new Federal energy efficiency standards 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 be found in 10 C.F.R. 430.2, and that the definition provided in Final Draft Version 6.0 has slight inconsistencies with the definition in 10 C.F.R. 430.2. ENERGY STAR and Department of Energy definitions should be exactly the same.

The Final Draft Version 6.0 reads, “Units of a given type of covered product (or class thereof) manufactured by one manufacturer, having the same primary energy source, and which have essentially identical electrical, physical, and functional (or hydraulic) characteristics that affect energy consumption, energy efficiency, water consumption or water efficiency.”

If the draft were to match the regulation, it would read, “All units of a given type of covered product (or class thereof) manufactured by one manufacturer and with respect to clothes washers, which have the same primary energy source, which have electrical characteristics that are essentially identical, and which do not have any differing physical or functional characteristics that affect energy consumption.”

AHAM suggests harmonizing the two definitions by incorporating the DOE language, thereby avoiding any future confusion.

B. Modified Energy Factor and Water Factor

AHAM agrees with the editorial changes made to EPA’s definition of these terms in Draft Version 6.0 to make them identical to DOE’s definitions.

II. **Qualification Criteria**

A. Cleaning Performance

AHAM is willing to work with EPA if it considers an increased stringency in levels during a future revision of Version 6.0 to consider including cleaning and rinse performance for commercial clothes washers.

B. Model Numbers

AHAM supports EPA’s revision of 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 Federal Trade Commission and DOE.

III. **Test Requirements**

AHAM strongly supports EPA’s decision to reference DOE’s sampling procedures for the purposes of qualification testing. 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

AHAM supports EPA's decision to make January 8, 2013, the effective date for the clothes washers specification, 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, Final Draft, Version 6.0 (Commercial Clothes Washers). We would be glad to discuss this matter further should you request.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Charlotte Skidmore', is positioned below the text 'Best Regards,'.

Charlotte Skidmore
Director, Energy & Environmental Policy