



GE Appliances

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Via e-mail to: appliances@energystar.gov

Ms. Amanda Stevens
ENERGY STAR Appliance Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

**Re: ENERGY STAR Program Requirements
Product Specifications for Residential Refrigerators and Freezers
Eligibility Criteria – Draft 2 Version 5.0**

Dear Ms. Stevens:

GE Appliances (“GE”) is pleased to submit these comments regarding the Environmental Protection Agency’s (“EPA” or the “Agency”) ENERGY STAR Program Requirements, Product Specifications for Residential Refrigerators and Freezers, Eligibility Criteria, Draft 2 Version 5.0 (the “Product Specifications”). GE has a long history of innovation and development of energy efficient products and is a multi-year recipient of ENERGY STAR Sustained Excellence awards. GE continues to support the ongoing development of ENERGY STAR criteria for refrigerator-freezers.

GE is a member of the Association of Home Appliance Manufacturers (“AHAM”). GE hereby reiterates and supports the comments filed by AHAM in this matter. In addition, GE notes the following:

Connected Product Criteria (Section 4)

A. Delay Defrost Capability (Section 4.B)

EPA proposes (lines 227-253) that the delay defrost capability of a connected refrigerator, freezer or refrigerator-freezer with automatic defrost now cover, at a minimum, two 4-hour peak load periods: the 3 p.m. -7 p.m. period specified in Draft 1, and a new period

from 6 a.m. – 10 a.m. Two 4-hour peak load periods will off one-third of the day, potentially adversely affecting product performance and reliability.

From a larger policy perspective, requiring a second automatic peak load deferral period would further shift the burden of electric grid load management onto household appliances and further dis-incentivize electric utilities from deploying a truly smart grid, one with interactive consumer features and behavior-modifying incentives such as time-of-use or other dynamic pricing. GE suggests that rather than requiring automatic peak load shifting, EPA should instead ensure that connected refrigerator-freezers have the capability to respond to peak load signals from utilities. That, together with consumer demand to take advantage of the smart capabilities of new refrigerators and other appliances will help drive built-out of the smart grid and opportunities for true energy savings, not just load-shifting.

GE appreciates the opportunity to submit these comments regarding the foregoing ENERGY STAR Product Specifications.

Respectfully submitted,



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GE Appliances