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January 4, 2013

Via E-Mail

Katharine Kaplan  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

Re: ENERGY STAR® Program Requirements Product Specification for Residential Refrigerators and Freezers Draft 2 Test Method to Validate Demand Response Rev. Nov-2012

Dear Ms. Kaplan:

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 Residential Refrigerators and Freezers Draft 2 Test Method to Validate Demand Response Rev. Nov-2012.

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 the Department of Energy (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 has the following comments on the Draft 2 Test Method.

## **I. Section 4 Test Requirements**

DOE references the DOE test procedure for additional guidance starting on line 54.

*Unless otherwise specified, all test conditions and requirements shall be identical to 10 CFR Part 430, 54 Subpart B, Appendices A or B, Section 2.*

DOE later makes a redundant statement in Section 5.2 “Communication Setup,” starting on line 65.

*The DOE Test Procedure shall provide guidance on the communication device setup for the DOE Baseline in Section 6.*

AHAM supports DOE removing the sentence starting on line 65 because it is redundant to what is already stated Section 4 “Test Requirements” on line 54.

## **II. Section 6.1 DOE Baseline**

- 1) In subpart A, DOE makes reference to Section 4.1 of the DOE Test Procedure for measuring the energy consumption,  $EP_1$ , and length of time,  $T_1$ . AHAM requests DOE make a similar reference to Section 3.2.1 of the DOE Test Procedure for “median” temperature set point to the following sentence starting on line 101.

*Conduct the test at the median temperature set point with the 101 anti-sweat heater switch, if present, in the “off” position.*

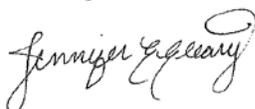
- 2) On line 117 of subpart B, DOE references  $EP_{AD}$  and  $T_{AD}$ , neither of which are defined in the document.

## **III. Section 7.2 Delay Appliance Load Test – Percent Reduction**

In subpart C, DOE states to “[v]erify no defrost cycle occurs” during the four hour window of the DAL signal. AHAM requests DOE explicitly define what qualifies as “no defrost cycle.” For example, a lab may interpret “no defrost cycle” as implying no pre-cool, as well. A lab technician would then have to take additional steps to verify no pre-cool occurs beyond simply verifying that the defrost heater did not come on.

AHAM appreciates the opportunity to submit comments on the ENERGY STAR Residential Refrigerators and Freezers Draft 2 Test Method to Validate Demand Response Rev. Nov-2012 and would be glad to further discuss these matters.

Best Regards,



Jennifer Cleary  
Director, Regulatory Affairs