



Kelley Kline

Counsel, Regulatory &
Product Stewardship Management

Appliance Park
AP2-225
Louisville, KY 40225

T 502-452-7603
kelley.kline@ge.com

May 5, 2014

Ms. Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

Via e-mail to: appliances@energystar.gov

Dear Ms. Stevens:

GE Appliances ("GE") is pleased to submit these comments regarding the ENERGY STAR Program Requirements, Product Specification for Room Air Conditioners, Eligibility Criteria, Draft Version 3.1. GE has a long history of innovation and development of energy efficient products.

GE hereby adopts by reference the comments filed in this matter by the Association of Home Appliance Manufacturers ("AHAM"), and would like to expand on those comments in several respects. Specifically, GE believes that releasing a new Energy Star Standard that exactly matches the DOE standard for the highest volume models (models under 8000 BTU/h) serves little purpose and defeats the purpose of having an Energy Star Standard. In addition, while GE appreciates DOE and EPA efforts to harmonize standards, since work has already started on Room Air Conditioner Specification Version 4.0 GE does not believe it is necessary to issue 3.1 simply to harmonize the standards. FTC has already indicated that it will require manufacturers to continue to use EER for Energy Guides until that agency completes its rulemaking process. As Appendix F provides for both EER and CEER calculations, continuing to use EER will not place additional burden on manufacturers and to do otherwise could lead to both consumer and utility confusion as further described by AHAM. As such, GE urges EPA to abandon the proposed crosswalk and retain Version 3.0.

Through the efforts of DOE, Energy Star and manufacturers, the energy efficiency of room air conditions has increased significantly over that last 14 years. Given the current efficiency of the room air conditioners, additional increases will yield little savings; a 10% efficiency increase will save the average consumer less than \$4 per year on a 5000 BTU/h unit. Given this limited potential future savings, GE does not believe that there are sufficient efficiency benefits to be gained to warrant an additional specification change, and therefore further urges EPA to sunset the Energy Star program for these products after the 2015 season.

Ms. Amanda Stevens

May 5, 2014

Page Two

GE appreciates the opportunity to submit these comments on ENERGY STAR Eligibility Criteria and would be glad to further discuss these matters.

Best Regards,

Kelley Kline

KK:pb