



April 26, 2013

Ms. Katharine Kaplan
Manager, ENERGY STAR Product Development and Program Administration
ENERGY STAR Appliance Program
U.S. Environmental Protection Agency
Washington, DC 20460

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Re: Alignment between ENERGY STAR Standards and DOE Energy Conservation Standards for Residential Refrigerators & Freezers

Dear Ms. Kaplan:

Lowe's requests that EPA align the ENERGY STAR specification effective date with the already scheduled Department of Energy (DOE) energy conservation standards on September 15, 2014.

Misalignment between the new Department of Energy (DOE) energy conservation standards and EPA's ENERGY STAR specification creates an unnecessary burden in both time and expense. Lowe's understands and values the ENERGY STAR program, as evidenced by earning our third consecutive Sustained Excellence Award in 2012, but we have to manage both the DOE standards and the ENERGY STAR specification along with product cycles and retail displays.

The latest proposed ENERGY STAR version of the specifications for residential refrigerators and refrigerator-freezers sets March 1, 2014 as the effective date for the new requirements; just over six months earlier than the new DOE energy conservation standards effective date of September 15, 2014. This schedule will force our retail stores to undergo two major floor transitions, one in March and a second in September.

Why is this an issue? Changing out the major appliance display areas of more than 1,750 stores is a significant logistics undertaking. Floor configurations are driven by models and price ranges along with available product. New standards from EPA and DOE require new model and item numbers. The confusion between the two standards can also lead to supplier production interruption that could lead to product exclusion until the next transition cycle. Additionally, each product transition, especially one that follows regulatory changes, requires updating of marketing and training materials on product performance.

In summary, Lowe's requests EPA delays issuing the new refrigerator specification until September or later so that a more complete range of qualified products can be integrated into the major floor transition that will occur in advance of the new DOE standards.

Sincerely,

Michael Chenard
Director, corporate sustainability