



ADMINISTRATIVE CENTER • 2000 N. M63 – MD 3502 • BENTON HARBOR, MI 49022 • 269.923.4646

October 9, 2012

Via Email

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR® Appliance Program
<mailto:appliances@energystar.gov>

Re: ENERGY STAR Program Requirements Product Specification for Residential Refrigerators and Freezers, Eligibility Criteria, Draft 3, Version 5.0

Dear Ms. Stevens:

As you know, Whirlpool Corporation has been a long-standing partner with EPA in its efforts to reduce Green House Gas emissions. Moreover, we are the leading appliance manufacturer in the world. To that end, we believe that we can offer fact based consumer-focused comments and are appreciative of the opportunity.

Please contact me with any questions and thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Nick Gillespie". The signature is written in a cursive, flowing style.

Nick Gillespie
Government Relations Manager

Whirlpool Corporation Comments
Residential Refrigerators and Freezers, Draft 3, Version 5.0
October 9, 2012

AHAM Comments

Whirlpool Corporation is an active and engaged member of the Association of Home Appliance Manufacturers (AHAM). As such we participated in and support the comments made on this subject by AHAM regarding this matter. Our comments herein supplement those remarks, specifically the 84 kWh/yr ice maker 'adder' issue and connected appliance language.

Icemaking measurement

As AHAM notes on page 3 of their comments, the DOE standards in 2014 will incorporate an 84 kWh per year uniform adder for icemaking. This is a constant adder that all icemaking products must include, meaning improvements in energy efficiency will have to be achieved solely through changes to the non-icemaking portions of the product. For example, the Federal minimum standard for a 21 cubic foot top mount refrigerator is 511 kWh/yr. This means a 10 percent reduction for ENERGY STAR would be to 460 kWh/year. However, if you remove the 84 kWh/year adder, the minimum standard baseline becomes 427 kWh/year with a 376 kWh/year ENERGY STAR threshold making this a reduction of 12 percent, not the 10 percent proposed by ENERGY STAR. Therefore, Whirlpool strongly feels that the ENERGY STAR criteria be applied to the portion of the 2014 refrigerator minimum standard without the ice maker adder, i.e. 427 kWh/yr in the above example, with an Energy Star threshold of 384 kWh/yr. This would make the reduction a true 10 percent for the portion of the energy consumption that a manufacturer can actually influence. We would only consider supporting a 10 percent level to the total amount once ice maker energy is actually measured and we have the option of making improvements to both portions of energy consumption. These comments apply to any refrigerator product class that includes the 84 kWh/yr for ice making, i.e. not just kitchable models.

Connected Appliance Language

There have been a lot of improvements made to the most recent draft of the Refrigerator ENERGY STAR specification to accommodate all key stakeholder preferences and inputs. Overall Whirlpool Corporation is in support of the draft as well as the changes proposed by AHAM in the attached document. However, Whirlpool Corporation would like to provide some additional thoughts on the 'system architecture' alternatives proposed in Section 4A.

Specifically on line 177 - remove the words "*on the consumer's premises*" to allow the Internet path i.e. protocol translation in the 'cloud'. To address the open access requested by other stakeholders such as electric utilities, Whirlpool Corporation would suggest inserting language into the cover letter to acknowledge that all parties would revisit the 'access' issue 12 months after the specification goes into effect to really evaluate if it manifested as an issue or not. An example statement could be: "*All key stakeholders agree to revisit the specifications established in Sections 4A, 4B and 4C as they pertain to the access and control of the appliance for the purposes of energy management and demand response services. This will be done no sooner than 12 months after the specification goes into effect to allow time for enough data to be collected.*"

Sunsetting of Freezers

EPA is proposing to sunset full-size freezers and compact freezers from the program in 2014, in light of the prior comments received from stakeholders and considering the stringency of the amended Federal standards for freezers. We continue to support this action for the same reasons outlined in our previous comments on this matter.

#####