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March 2, 2012

By E-Mail

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Draft 2, Version 6.0, Combination (All-in-One) Washer-Dryers

Dear Ms. Stevens:

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 Clothes Washers, Eligibility Criteria, Draft 2, Version 6.0 regarding combination (all-in-one) washer-dryers.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's more than 150 members employ tens of thousands of people in the U.S. and produce more than 95% of the household appliances shipped for sale within the U.S. 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. But EPA should not add products to product specifications without coordination with DOE and without doing the proper research and analysis to determine that it is appropriate for the product category to be included in the qualification criteria.

I. **Definitions**

A. Combination All-in-One Washer-Dryer

EPA again proposed to define “combination all-in-one washer-dryer” as “[a] consumer product designed to clean and dry fabrics in a single drum, where drying is accomplished through use of electricity or gas as a heat source and forced air circulation” (emphasis added).

AHAM does not oppose the proposed definition, except for the inclusion of the underlined language (“or gas”). AHAM is not aware of any products meeting EPA’s proposed definition that use gas as a heat source. And during the webinar EPA held on October 21, 2011, EPA also indicated that it had not identified any such products during its research. Accordingly, such products should not be included in the definition. If such products later enter the market, they should then be studied and a determination made as to whether they should be eligible for ENERGY STAR. Until then, no determination can appropriately be made as there is no data upon which to base eligibility criteria.

B. Residential Clothes Washer With Optional Dry Cycle

EPA proposed to add a definition for “residential clothes washer with optional dry cycle.” EPA stated that it “learned that a new clothes washer will be introduced in the U.S. that would offer consumers the option of adding a dry cycle to a selected wash cycle. Thus, it could not be tested using the approach being used for a combo W/D. EPA is proposing that a product with this feature be eligible to earn the ENERGY STAR as a clothes washer. However, given that this type of product is anticipated to have some of the functionality of a combo W/D (in particular, the option to dry a regular sized load, using a gas or electric heating element), EPA is also proposing that a manufacturer report information on the energy and water consumption of the add-on dry cycle to EPA.”

AHAM is not commenting on whether or not residential clothes washers with optional dry cycles should be eligible for ENERGY STAR as a general matter. But we are commenting that the manner in which EPA seeks to add such products to the clothes washer specification is inappropriate. A more detailed evaluation and process is necessary, as is consultation with DOE. At the very least, research needs to be done to determine whether the criteria for clothes washers are appropriate for clothes washers with optional dry cycles and how such products can be tested.

AHAM opposes EPA adding products to ENERGY STAR product specifications without coordination with DOE. DOE regulates clothes washers and its regulations have definitions and a test procedure that apply to clothes washers. It should be DOE that makes a determination as to whether clothes washers with optional dry cycles are classified as clothes washers. And if they are, DOE would need to prescribe a test procedure (perhaps through a waiver process) to allow such products to be certified under its regulations. DOE has considerable knowledge and experience with test procedures and is the proper agency to decide whether and how to address new products that may fall within an existing product category. Then EPA could evaluate whether the product is appropriate for inclusion in the ENERGY STAR program. EPA should not circumvent DOE’s expertise by deciding that these products should be classified as

residential clothes washers, especially without having done the proper research and investigation or seeking feedback from stakeholders. Accordingly, AHAM cannot support the addition of a definition for clothes washer with optional dry cycle at this time.

II. Scope

EPA stated that at “the end of this spec development effort for Version 6.0, EPA plans to amend Version 5.1 to include the final two definitions and scope clarifications being proposed in this spec revision, and specifying that Residential Clothes Washers with Optional Dry Cycle won’t be eligible for qualification under Version 5.1, but could be qualified to Version 6.0 provided they meet the reporting requirement.”

AHAM opposes the definition for “residential clothes washers with optional dry cycle” being added to the Version 5.1 specification. If such products will not be eligible for qualification under that specification, and will not be mentioned in the “excluded products” section of the scope, why should Version 5.1 be revised to include a definition for them? Furthermore, AHAM seeks clarification on the timing EPA is proposing for potential qualification of these products—would it be upon Version 6.0 becoming effective?

III. Qualification Criteria—Reporting Requirement for Residential Clothes Washers With Optional Dry Cycle

EPA proposed a reporting requirement for residential clothes washers with an optional dry cycle. The proposed requirement seeks information on the test procedure used to test the product and provides several “notes” on what portions of DOE’s test procedure should be used as well as how the testing should vary from that procedure. This demonstrates that there is not currently a test procedure adequate for testing these products. DOE, not EPA, is the appropriate agency to develop a test procedure if it deems it appropriate.

Furthermore, this inquiry as to how the product is tested indicates that it would be possible that several clothes washers with optional dry cycles could be tested per different procedures and still qualify for ENERGY STAR. It will be impossible for consumers to compare products if the products are not tested in an identical way. Similarly, allowing qualification of residential clothes washers with an optional dry cycle under the clothes washer criteria will mislead consumers because it will not adequately represent the energy and/or water used by the dry cycle. That is exactly the reason EPA disallowed qualification for combination washer/dryers and started this specification revision to account for the dryer energy use. Thus, we are confused as to why EPA would allow qualification of a product that presents the same challenges without any investigation into the energy use and water use characteristics of that product prior to allowing it to qualify for ENERGY STAR.

AHAM appreciates the opportunity to submit these comments on the ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Draft 2, Version 6.0 regarding combination (all-in-one) washer-dryers, and would be glad to further discuss these matters should you so request.

Respectfully submitted,

A handwritten signature in black ink, reading "Jennifer Cleary". The signature is written in a cursive, flowing style with a large initial 'J'.

Jennifer Cleary
Director, Regulatory Affairs