



BOSCH

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Ms. Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
1200 Pennsylvania Avenue, NW
Washington, DC 20460

ENERGY STAR Program Requirements Product Specification for Residential Refrigerators and Freezers – Eligibility Criteria Draft 1 Version 5.0

Dear Ms. Stevens:

Robert Bosch LLC (Bosch), a U.S.-based subsidiary of Robert Bosch GmbH, is pleased for the opportunity to comment in response to the agency's proposal for a 5% ENERGY STAR credit for refrigerators and freezers with Smart Grid functionality or Demand Response technology.

Bosch has been a leading global supplier of technology and services in the areas of Automotive, Industrial Technology, Consumer Goods, and Building Technology for over 100 years. When designing our systems, we pay close attention to combining efficient use of natural resources, system flexibility, and user friendliness. All of our products are designed with energy efficiency in mind and are intended to enhance quality of life, while operating in an environmentally friendly manner.

We have a long history of supporting the ENERGY STAR program and we are on the forefront of Smart Grid functionality development. However, we are concerned that this initiative, although currently focused on refrigerators and freezers, will be expanded to include other product areas under ENERGY STAR, such as heating, ventilating, and air conditioning (HVAC).

We share the same opinion of BSH Home Appliances Corporation (BSH) concerning the decoupling of Smart Grid functionality from energy efficiency. We strongly support both the ENERGY STAR program and the promotion of Smart Grid functionality, yet we are concerned that by offering a Smart Grid qualification credit to manufacturers, this will enable less efficient products to earn the ENERGY STAR mark without actually improving a products' energy efficiency or performance. This seems to go against ENERGY STAR's intent to promote energy efficient products and reduce greenhouse gas emissions.

Yours sincerely,

A handwritten signature in black ink that reads "Meredith Tunick".

Meredith Tunick
Manager, Federal Government Affairs
Robert Bosch LLC