

| REF No. | Topic | Comment | Response |
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| 1 | Definition | <p>The proposed definition, except for the inclusion of the "or gas," is supported. There is no evidence, at this time, of any products that meet EPA's proposed definition that use gas as a heat source. 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.</p> | <p>While EPA is not aware of any combo W/Ds with gas as a heat source, EPA also does not believe a lack of product is a reason to exclude this type of washer-dryer from the scope of the definition. The intent of this specification development effort has been to consider requirements for combo W/Ds to ensure ENERGY STAR label addresses whole-product performance. Thus, the definition has been developed to cover all products that provide consumers with the ability to both wash a load and the option to dry a load (irrespective of its heat source). EPA would consider data on gas combo W/D product drying performance when it becomes available in order to further consider whether separate requirements are necessary for this class of products.</p> |
| 2 | Definition | <p>One stakeholder did not support the definition for combination all-in-one washer-dryer while another stakeholder indicated that they did not oppose this definition.</p> | <p>EPA appreciates this feedback. EPA has retained this definition in the Final Draft.</p> |
| 3 | Definition | <p>The proposed addition of a definition for Residential Clothes Washer with Optional Dry Cycle is not necessarily opposed. However, defining such products as a mere subset of Residential Clothes Washers is problematic. More to the point, including such products for ENERGY STAR qualification is opposed.</p> | <p>Based on stakeholder feedback and given the limited information that is currently available on the type of product that would meet the definition of a residential clothes washer with an optional dry cycle, EPA has decided it is more prudent to wait to include them until there is a selection of products with an optional dry cycle available on the market and appropriate testing standards for them have been developed. Therefore, in the Final Draft Version 6.0 specification, EPA has proposed that clothes washers with an optional dry cycle not be eligible for ENERGY STAR qualification. EPA is interested in additional feedback on why it is problematic to define a clothes washer with an optional dry cycle as a subset of residential clothes washers.</p> |
| 4 | Scope | <p>If residential clothes washers with optional dry cycle are not eligible for qualification under Version 5.1 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?</p> <p>Clarification is sought on the timing EPA is proposing for potential qualification of residential clothes washers with optional dry cycle. Would it be upon Version 6.0 becoming effective?</p> | <p>To clarify, EPA's intent was to modify Version 5.1 to include a definition for a residential clothes washer with an optional dry cycle and also exclude them from the scope. This was to ensure that this type of product fulfills the reporting requirement (of Version 6.0) to qualify.</p> <p>In general, manufacturers can qualify a product to a new specification as soon as EPA finalizes the specification.</p> |
| 5 | Scope | <p>The scope of eligibility criteria, where combination washer-dryers are not eligible for ENERGY STAR qualification is agreed with. As EPA correctly points out, such products not only use additional energy to provide heat in their dry cycle, but additional water in the dry cycle as well. In fact, as EPA also notes, the additional water consumption of combination washer-dryers in their dry cycle may be more than the amount used for washing.</p> | <p>EPA appreciates this feedback.</p> |

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| 6 | Eligibility for Qualification / Test Requirements | <p>There is currently no test procedure for Clothes Washers with Optional Dry Cycle and DOE, not EPA, would be the appropriate agency to develop such a test procedure if it deems it appropriate. Without a clearly defined and approved test procedure, different models of this product could use different test procedures and still qualify for ENERGY STAR. Such an outcome would deny consumers the ability to accurately compare products. Similarly, allowing Washers with Optional Dry Cycle to qualify for ENERGY STAR under the Residential Clothes Washer criteria will mislead consumers because it will not adequately represent energy and/or water use of the dry cycle. This is why EPA excludes Combination Washer-Dryers from ENERGY STAR qualification and this same exclusion should apply to Washers with Optional Dry Cycle, as defined in the Eligibility Criteria.</p> | <p>DOE believes that clothes washers with an optional dry cycle are clothes washers and would therefore be tested using Appendix J1. The dryer function of a clothes washer with an optional dry cycle was not explicitly contemplated in either the DOE standards or test procedure rulemakings. DOE notes, however, this fact alone does not exclude them from coverage as clothes dryers. DOE believes the characteristics of a clothes washer with an optional dry cycle may preclude them from testing using the clothes dryer test procedure, Appendix D1. As a result, DOE may need to further consider how to address this type of product.</p> <p>EPA is open to re-evaluating the inclusion of washers with an optional dry cycle when the residential clothes washer criteria are reviewed for possible revision later in 2012.</p> |
| 7 | Eligibility for Qualification / Test Requirements | <p>Adding products to ENERGY STAR product specifications without coordination with DOE is opposed. 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. 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.</p> | <p>EPA has coordinated with DOE throughout this process as possible requirements for combo W/Ds (and related products) have been considered to ensure ENERGY STAR label addresses whole-product performance. An essential step of this process has been for the ENERGY STAR program to develop, in coordination with stakeholders, applicable definitions.</p> <p>The DOE Appliance and Equipment Standards Program covers all clothes washers, including those with an optional dryer cycle and the washing function of combination washer-dryers, under the existing definition of clothes washer and are classified according to method of loading and capacity. Manufacturers use the DOE test procedure for clothes washers (Appendix J1) to determine compliance with the applicable federal standards for clothes washers and to qualify for the ENERGY STAR.</p> <p>The DOE regulations do not explicitly define a combination all-in-one washer-dryer or a clothes washer with an optional dry cycle. Therefore, in coordination with DOE, EPA developed and proposed applicable definitions as part of this specification revision process. In the Final Draft, after considering stakeholder feedback, EPA has removed the test guidance and reporting requirement for clothes washers with an optional dry cycle; instead, products that fall under this definition would be unable to qualify for the ENERGY STAR under Version 6.0 specification. EPA plans to review the residential clothes washer criteria for possible revision later in 2012 and is open to re-evaluating washers with an optional dry cycle, at that time.</p> |

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| 8 | Eligibility for Qualification | <p>Washers with Optional Dry Cycles should not be eligible for ENERGY STAR qualification as Residential Clothes Washers. Like Combination Washer-Dryers, Washers with Optional Dry Cycle will clean and dry fabrics in a single drum. Also like Combination Washer-Dryers, such products will use electricity (or gas) as a heat source. Not mentioned in the definition, but understood elsewhere in the eligibility criteria, Washers with Optional Dry Cycle may likely use water in the dry cycle as do Combination Washer-Dryers. In fact, one of the few substantive differences between Washers with Optional Dry Cycle and Combination Washer-Dryers (assuming the latter also clean clothes with soap and water) is that the former would not allow drying to be selected independently from a wash cycle. In asking consumers to distinguish ENERGY STAR qualification for just the wash function in a product that uses additional energy, heat, and water in a full-load dry cycle, Washers with Optional Dry Cycle are perhaps more problematic than excluded Combination Washer-Dryers.</p> | <p>EPA appreciates this feedback. After further consideration, EPA believes it is more prudent to wait to include them until there is a selection of products with an optional dry cycle available on the market and appropriate testing standards for them have been developed. Once appropriate test requirements are identified or developed, the full performance (wash and dry) of this type of clothes washer can be evaluated. For Version 6.0 specification, EPA has removed the reporting requirement in the Final Draft, and instead, has specified that products that fall under the definition of a residential clothes washer with an optional dry cycle are not eligible to earn the ENERGY STAR.</p> |
| 9 | Eligibility for Qualification | <p>Believes the manner in which EPA seeks to add Residential Clothes Washers with Optional Dry Cycle 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.</p> | <p>EPA had learned that at least one manufacturer was planning to release a new clothes washer in the U.S. that would offer consumers the option of adding a dry cycle to a selected wash cycle. In response to this information, in Draft 2, EPA addressed this product type by including a new definition. EPA does not view step this as adding a product to a specification, but rather, a necessary part to further clarify the eligibility status of products with combination washer-dryer functionality. As part of this, EPA proposed a new definition for residential clothes washer with option dry cycle, developed through discussion with DOE. While EPA has received some information on this product from a stakeholder, EPA is not aware of any products meeting the definition of a clothes washer with optional dry cycle that are commercially available in the U.S. which limits the opportunity to conduct additional research and evaluation. See also response 3.</p> |
| 10 | Testing Guidance | <p>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 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.</p> | <p>See response 7.</p> |
| 11 | Testing Guidance | <p>EPA's 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, it is confusing 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.</p> | <p>See response 8.</p> |