



August 9, 2011

Via E-Mail

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

Re: ENERGY STAR Residential Refrigerators and
Freezers Version 5.0 Specification Framework Document

Dear Ms. Stevens:

On behalf of the Electrolux Home Products, Inc. (EHP), I would like to provide our comments to the Environmental Protection Agency (EPA) ENERGY STAR Residential Refrigerators and Freezers Version 5.0 Specification Framework Document (Framework Document).

EHP is a leading manufacturer of Refrigerators, Refrigerator-Freezers and Freezers and other appliances sold in the United States and a member of the Association of Home Appliances Manufacturers (AHAM). It is the understanding of EHP that yesterday AHAM submitted comments for this Framework Document. EHP is in agreement with the comments provided by AHAM, but wishes to add additional comments.

I. Anticipated Scope of Revisions - Potential Sunset of Specified Product Classes

EPA stated in the Framework Document that, “[a]s an alternative to strengthening the levels for compact refrigeration and full size freezer product classes, EPA could sunset certain product categories in 2014.” In particular, EPA seems to suggest a potential sunset for manual and partial defrost full-size refrigerators, full-size freezers, compact refrigerators, and compact freezers. EPA sought comment on whether it should revise the criteria for these product classes in the version 5.0 revision. EHP supports EPA revising the criteria for these product classes in the 5.0 revision and would not support a sunset of any of the above mentioned product classes. Continuing to have ENERGY STAR

ELECTROLUX HOME PRODUCTS NORTH AMERICA

MAILING ADDRESS

P.O. BOX 4107
ANDERSON, SC 29622-4107
USA

OFFICE ADDRESS

101 MASTERS BLVD
ANDERSON, SC 29626
USA

TELEPHONE

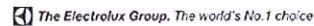
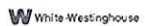
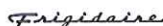
864 224 5264

TELEFAX

864 716 2209

SITE

www.frigidaire.com
www.poulan.com
www.weedeater.com



levels for these product classes will maximize consumer choice in ENERGY STAR products.

II. Other Considerations

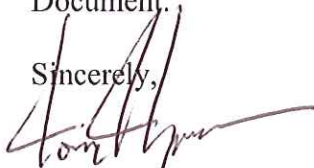
EPA stated in the Framework Document "Research collected from the 2009 United National Environmental Program Technology and Economic Assessment Panel indicates that the foam thermal conductivity of cyclo and cyclo/iso pentane blends are, with intensive system optimization, lower than HFC 134a, but slightly higher than HFC 245fa." EHP opposes a condition that would make the use of low GWP (Global Warming Potential) foam blowing agents an absolute requirement in the ENERGY STAR 5.0 specification. Over the next several years, energy consumption levels are already mandated to be reduced significantly, across the board. EPA's own reference indicates that this proposal adds an additional energy burden to the users of HFC 245fa and research into the subject indicates that the thermal conductivity burden to be approximately 9% (Aging of Polyurethane Foam Insulation in Simulated Refrigerator Panels — Four-Year Results with Third-Generation Blowing Agents; Kenneth E. Wilkes, David W. Yarbrough, Gary E. Nelson of Oak Ridge National Laboratory and J. Richard Booth of Tennessee Technological University). However, EHP would support a proposal encouraging low GWP blowing agents through an offsetting allowance towards ENERGY STAR listing.

III. Smart Grid Functionality

The Smart Grid definition proposed by Energy Star list two options for the "Delay Load" reaction for refrigeration. The first option is: Delay defrost and delay ice harvest. The second option is: Delay defrost and reduce average wattage by 9.6W. EHP opposes non-ice maker units having to comply with the 9.6W average reduction. This expectation will place an undue burden on non-ice maker models. Since non-ice maker models cannot comply with option 1, they will be forced to reduce 9.6W during this period. The 9.6W number originates with the estimated ice maker energy; and non-ice maker models have effectively achieved this ice maker energy reduction. Requiring non-ice maker models to reduce an additional 9.6W is doubly burdening the units.

We thank you for the opportunity to provide comments on the ENERGY STAR Residential Refrigerators and Freezers Version 5.0 Specification Framework Document.

Sincerely,



Tom Thompson
V.P. of Technology
Electrolux Home Products North America
101 Masters Blvd.
Anderson, SC 29622