

GE Appliances

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Ms. Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

Via e-mail to: appliances@energystar.gov

Re: ENERGY STAR Program Requirements
Product Specification for Clothes Washers
Eligibility Criteria Draft 2 Version 6.0

Dear Ms. Stevens:

GE Appliances ("GE") is pleased to submit these comments regarding the ENERGY STAR Program Requirements, Product Specification for Clothes Washers, Eligibility Criteria, Draft 2 Version 6.0 ("Eligibility Criteria"). GE has a long history of innovation and development of energy efficient products and is a multi-year recipient of ENERGY STAR Sustained Excellence awards. GE continues to support the ongoing development of ENERGY STAR criteria for home appliances.

GE hereby reiterates and supports the comments filed in this matter by the Association of Home Appliance Manufacturers ("AHAM"), of which GE is a member. In particular, GE supports the Environmental Protection Agency ("EPA") and the Department of Energy ("DOE") in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement through the ENERGY STAR program. However, EPA should not add products or 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 ENERGY STAR qualification criteria. It is critical that in their administration of the program, EPA and DOE apply clear, consistent, and transparent rules and procedures. In addition, GE notes the following:

Definitions and Scope (Eligibility)

GE does not oppose the addition or the definition of Combination All-in-One Washer-Dryer ("Combination W/Ds"). GE further agrees with the Scope of the Eligibility Criteria that Combination W/Ds are not eligible for ENERGY STAR qualification.

GE does not necessarily object to the proposed addition of a definition for Residential Clothes Washer with Optional Dry Cycle (sometimes referred to herein as "Washers with Optional Dry Cycle"). However, defining such products as a mere subset of Residential Clothes Washers is problematic. More to the point, for reasons discussed herein, GE would object to such products being included as eligible for ENERGY STAR qualification as a Residential Clothes Washer.

As previously noted, Combination W/Ds are not eligible for ENERGY STAR qualification. 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 W/D's in their dry cycle may be more than the amount used for washing. For these reasons, Combination W/Ds are properly excluded from ENERGY STAR eligibility.

For much the same reasons, Washers with Optional Dry Cycles should not be eligible for ENERGY STAR qualification as Residential Clothes Washers. Like Combination W/Ds, Washers with Optional Dry Cycle will clean and dry fabrics in a single drum. Also like Combination W/Ds, 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 W/Ds. In fact, one of the few substantive differences between Washers with Optional Dry Cycle and Combination W/Ds (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 W/Ds.

Reporting Requirement for Residential Clothes Washers with Optional Dry Cycle

EPA proposes a reporting requirement for Residential Clothes Washers with Optional Dry Cycle. This proposed requirement seeks information on the test procedure that would be used, and how that test procedure would vary from DOE's existing test procedure for Residential Clothes Washers. However, the fact remains that there is no currently test procedure for Residential 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 the energy and/or water use of the dry cycle. This is why EPA excludes Combination W/Ds from ENERGY STAR qualification. The same exclusion should apply to Residential Clothes Washers with Optional Dry Cycle, as defined in the Eligibility Criteria.

GE appreciates the opportunity to submit these comments on ENERGY STAR Eligibility Criteria and would be glad to further discuss these matters.

Best Regards,

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