GE Appliances & Lighting

David N. Baker
Counsel – Government Relations &
Regulatory Compliance

Appliance Park, AP2-225
Louisville, KY 40225

T 502 452 5168
F 502 452 0347
david.baker2@ge.com

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Via e-mail to: appliances@energystar.gov

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

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

Dear Ms. Stevens:

GE Appliances ("GE") is pleased to submit these comments regarding the Environmental Protection Agency's ("EPA" or the "Agency") ENERGY STAR Program Requirements, Product Specifications for Residential Refrigerators and Freezers, Eligibility Criteria, Draft 1 v. 5.0. 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 refrigerator-freezers.

GE hereby reiterates and supports the comments of the filed by the Association of Home Appliance Manufacturers ("AHAM"), of which GE is a member. In addition, GE notes the following:

1. Section 3A Energy Use Requirements

While the hyperbolic tangent approach outlined by EPA provides a workable interim alternative for 2012 and 2013, GE believes it is critical that EPA only proceed with this alternative with the explicit understanding and agreement that such a hyperbolic tangent approach will not be appropriate in future revisions. Given the multiple, upcoming changes in the energy use test procedure that will take effect in 2014, it will be difficult if not impossible to develop a crosswalk to a hyperbolic tangent curve that would be credible and would assure a fair and even impact across the industry. Specifically, any

hyperbolic tangent curve created for 2014 could not be based on previous data due to the implementation of the new test procedure. Thus, the curve would need to be estimated which would lead not only to uncertainty and potential confusion on the part of manufacturers' development teams, but also to customer confusion comparing products from one year to the next. GE urges EPA to clarify in moving forward with the hyperbolic tangent for this revision, that an alternate approach such as a flat percentage will be adopted in subsequent years to effectively incorporate and recognize the impacts of the coming test procedure changes.

2. Section 4B Delay Defrost Capability

GE reiterates and adopts the language in Section 4B proposed by AHAM, to wit:

B. Delay Defrost Capability

A "Connected" refrigerator, refrigerator-freezer, or freezer shall have a delay defrost capability where the consumer can input or the product itself shall identify, the time of day, and the product shall automatically move the defrost function outside of the 4-hour peak load period specified by the local utility or the traditional peak period, defined as 3pm to 7pm in most parts of the United States. The product shall provide the consumer with the option to modify the scheduling of this functionality in order to, for example, respond to a short term request from the utility, or adjust to a utility service territory that peaks during a different time period.

Note: Products with delay defrost capability could automatically avoid defrosting during traditional periods of peak energy consumption. This capability does not require a signal from a utility and thus can provide grid benefit as soon as these products are put into service. EPA estimates that this function, deployed across 1 million refrigerators could reduce power during the assumed peak period (3-7pm) by about 3.5 megawatts (MW) and would shift approximately 8.4 gigawatt-hours (GWh) annually from peak to non-peak periods.

3. Section 4D (3) Information to Consumers

GE reiterates and adopts the language in Section 4D (3) *Information to Consumers* proposed by AHAM, to wit:

3. *Information to Consumers:* If additional modules, devices and/or infrastructure are part of the configuration required to activate the product's communications capabilities specified in Section C, prominent labels or other forms of consumer notifications with instructions shall be displayed at the point of purchase and in the product literature. These shall provide specific information on what consumers must do to activate these capabilities (e.g. *"This product requires installation of a manufacturer provided external network module to enable interconnection with the Smart Grid, Energy Management System, and/or with other external devices, systems or applications."*).

If the product requires installation of one or more communication modules to enable communications specified in C, these modules must be easily user installable and shall either ship with the product or be provided to consumers by the manufacturer, or manufacturer's authorized representative or at point of purchase, in a reasonable amount of time at no additional cost to the consumer.

4. EPA should adopt a label designation for Low GWP Foam Blowing Agents.

Although EPA has deferred requiring that ENERGY STAR refrigerator-freezers use only low GWP foam blowing agents, EPA should not wait until the next round of ENERGY STAR revisions to recognize the environmental benefits of these products. Given the environmental benefits outlined in EPA's Framework document, EPA should not delay and should consider implementing interim measures to recognize products utilizing low GWP foam blowing agents. Recognizing the use of low GWP agents is an important first step in accelerating the environmental benefits achieved through adoption of these products, and in providing consumers with important information regarding the environmental footprint of the products they are purchasing. We urge EPA, over the coming year, to study which low GWP foam blowing agents should be recognized and how to most effectively recognize them, and then to provide a methodology in 2012 to begin to recognize these products through a label designation in 2013.

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For the foregoing reasons, GE urges EPA to:

1. Limit use of the hyperbolic tangent to interim use in 2012 and 2013 and explicitly recognize its inapplicability to new test procedures scheduled to be implemented in 2014:

2. Require a Delay Defrost Capability for "connected" refrigerator-freezers that shall automatically move the defrost function outside of the traditional or otherwise specified peak load period;

3. Adopt language for Section 4D (3) *Information to Consumers*, as indicated; and

4. Adopt a label designation for low GWP foam blowing agents.

Please let me know if you have any questions or would like any additional information.

Sincerely,

David N. Baker
Counsel, Government Relations
& Regulatory Compliance
GE Appliances & Lighting