



Ms. Brenda Edwards, EE-41  
Office of Energy Efficiency and Renewable Energy,  
Energy Conservation Program for Consumer Products  
U.S. Department of Energy  
1000 Independence Avenue, SW.  
Washington, DC 20585-0121

Re: Framework Document for Residential Clothes Washers

Docket Number: EERE-2008-BT-STD-0019  
RIN: 1904-AB90

Dear Ms. Edwards:

Thank you for the opportunity to comment on the recently released Framework Document for residential clothes washers. Northeast Energy Efficiency Partnerships (NEEP) strongly encourages the Department of Energy (DOE) to promulgate the most stringent possible rule governing the efficiency standards of this appliance. The effort to set strong energy efficiency standards for residential clothes washers is of paramount importance for Northeast residents as they face some of the highest energy costs in the nation; costs that drain the economy. Strong energy efficiency standards on residential clothes washers will sharply reduce consumption of electricity, lower peak electricity demand, significantly reduce pollution and create new economic opportunities.

We view this as a crucial stage in the Department's process to set revised standard levels for clothes washers. In order for these standards to achieve the stated goal of affecting the maximum energy savings that is economically achievable, NEEP would like to address a number of issues that either threatens this goal or would improve the likelihood of achieving such a goal.

- **Test Procedure Revision**
  - DOE cannot continue to defer an already overdue test procedure for clothes washers indefinitely. While we agree that the update to the test procedure should ideally harmonize with the procedure that the IEC is in the process of finalizing, DOE risks the potential for this waiting process to get drawn out at the detriment of the standard rulemaking. DOE should consider a deadline for the IEC procedure to be finalized, after which date DOE should proceed in a quick manner to revise the existing test procedure independently.
- **Product Classes**
  - The residential clothes washer market has transformed to the point that to distinguish between top loading and front loading washers no longer makes practical sense for the standards setting process. A clothes washer's singular purpose is to wash soiled clothing materials. How consumers load and unload the clothes into the machine does not represent a significant functionality, for which separate standards are necessary.
  - Consumer preference for front loading clothes washers has shifted dramatically in recent years. Market share of front loading clothes washers has grown to roughly 35%, up from 15% just 5 years ago, and is expected to continue to grow.
  - While we have not yet secured research data to further bolster this trend, we are in the process of working with industry data to further illustrate this reality. This will be delivered to the Department when it becomes available.



- During the 2004 ENERGY STAR Criteria Stakeholders meeting, Whirlpool cited familiarity as a large reason that consumers, at the time, preferred top loading machines to front loading washers. With the market at nearly 35%, familiarity with this loading configuration is no longer an issue.
- NEEP strongly urges the Department to reconsider this relic of past rulemakings and older clothes washer markets, and discontinue the practice of enacting different standards based on loading configuration.
- **Abundance of market pull programs**
  - “Market-pull” programs exist throughout the country working to promote ENERGY STAR qualified clothes washers. These programs have been instrumental in creating the awareness and educating the public about the benefits of energy efficiency, efforts that have helped transform the clothes washer market. (See the attached summary of ENERGY STAR appliance programs for details)
  - Federal tax credits continue to incentivize manufacturers to produce high efficiency products. Amounts between \$75-\$250 have been, and will be, offered between 2008-2010.
  - As part of the American Recovery and Reinvestment Act (ARRA), states will soon be provided a total of \$300 million to encourage the sale of ENERGY STAR qualified appliances, including clothes washers.
  - The existence of a robust infrastructure of market pull programs does not mitigate the importance or need for strong federal standards. The success of these efforts to shift product efficiency has enabled the department to analyze higher levels of efficiency. Standards are the appropriate compliment to a strong presence of programs.
  - The ENERGY STAR criteria for clothes washers is a performance based system. The program does not set different qualification levels based on loading configuration, a precedent we hope this standards process adopts. The effect of the ENERGY STAR label has been the growth of top loading units that meet the aggressive performance levels.
- **Sales/Shipment data**
  - Historical clothes washer shipment data
    - Attached, developed with AHAM data
  - Average historical clothes washer efficiency data
    - Attached Historical energy use trends, developed w AHAM data
  - ES Market penetrations
    - Attached, ES Appliance penetrations

At this point in the rulemaking, we would like to communicate our strong preference that the Department earnestly consider eliminating the class distinction based on point of entry for loading materials. Reflecting the current, and projected, state of the clothes washer market, NEEP recommends the consolidation of top loading and front loading product classes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan E. Coakley', written in a cursive style.

Susan E. Coakley, Executive Director