



NRDC Comments on EPA ENERGY STAR's Draft 1 Version 7.0 Specification for Residential Clothes Washers

October 5, 2012

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's Draft 1 Version 7.0 Specification for Residential Clothes Washers. As EPA notes in the specification documentation, ENERGY STAR clothes washers reached a market share of 60 percent in 2011. Given this high market share and the availability of many higher efficiency clothes washers on the market, NRDC strongly supports the revision of this ENERGY STAR specification.

NRDC generally supports the proposed criteria, but recommends that EPA consider adding a new tier for small washing machines. In general, NRDC is supportive of the proposed criteria of a minimum MEF of 2.6 and a maximum WF of 3.7. As EPA notes, this specification represents 23 percent of washing machines on the market, is more stringent than the top CEE tier, and still includes both top and front loading options. Given the speed at which the market moved to the Version 6.0 specification, it is important that EPA set appropriately stringent criteria for Version 7.0 and NRDC believes EPA has achieved this in the Draft 1 proposal.

However, we encourage EPA to look at whether any washing machines under 2.5 cubic feet would qualify for the proposed specification and consider setting a separate tier for these small machines. NRDC encourages EPA to coordinate the development of the Draft 7.0 specification with the ENERGY STAR Most Efficient 2013 specification currently under development which includes a separate tier for small and large machines. In the draft 2013 Most Efficient criteria, EPA proposes that small machines meet a minimum MEF of 2.4 and maximum WF of 4.5, which is less stringent than the proposed Draft 1 Version 7.0 ENERGY STAR specification. This is obviously problematic and EPA should coordinate the two specifications to ensure that a washing machine doesn't qualify as Most Efficient, but not regular ENERGY STAR. Additionally, EPA's September 27 webinar on the proposed 2013 Most Efficient specifications notes that only 5 models meet the proposed criteria for small washing machines. This indicates that EPA should consider adding a small machine tier as part of the Version 7.0 and adjusting the proposed criteria for these small machines.

NRDC encourages DOE and EPA to develop a cleanability test to be used in the next specification revision. Ensuring that clothes washers continue to perform well is critical to meet consumer needs and to preserve consumer trust in the ENERGY STAR program. While there are many high performing, high efficiency models in the Consumer Reports

ratings¹ (in fact, the top ten ranked machines in both the front and top-loader categories qualify for ENERGY STAR), there are also some ENERGY STAR models that do not perform as well on the Consumer Reports ratings. While the majority of ENERGY STAR washing machines in the Consumer Reports ratings receive “very good” or “excellent” marks for washing performance, there are many ENERGY STAR machines which only rank “good” for washing performance, and one ENERGY STAR machine that only ranks as “fair” for washing performance. This indicates that overall ENERGY STAR washing machines are performing very well, but that there are some which do not perform as well.

Given the many high performance models available that meet the proposed specification and the high market share of current ENERGY STAR clothes washers, NRDC agrees with EPA’s decision to move forward with an updated specification without a cleanability test. However, we encourage DOE and EPA to develop a cleanability test procedure that can be utilized in the next specification revision. In developing this test, EPA should also take into consideration other factors that affect utility, such as cycle time.

NRDC agrees with the exclusion of combined washer dryers. NRDC agrees with EPA’s proposal to exclude combined washer dryers from the proposed specification. These machines can use significantly more water than a separate washer and dryer and should not be included in ENERGY STAR at this time.

NRDC supports the inclusion of a five percent energy allowance for washing machines with connected abilities. NRDC supports the inclusion of a temporary five percent energy allowance for washing machines that meet connected criteria and awaits EPA’s development of a test procedure for connected features. When incorporating connected features into the ENERGY STAR specification, EPA should ensure that any additional energy use (standby or otherwise) added by these features is captured in the test procedure and reflected in the specification.

Thank you for the opportunity to submit these comments.

Sincerely,



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¹ <http://www.consumerreports.org/cro/appliances/laundry-and-cleaning/washing-machines/front-loading-washing-machine-ratings/ratings-overview.htm>