

March 30, 2021



U.S. Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, D.C. 20460
Appliances@energystar.gov

Subject: ENERGY STAR® Product Specification for Clothes Washer Draft Version 8.1

Dear Ms. Park,

The Northwest Energy Efficiency Alliance (NEEA) submits this letter in response to the request for comments on the Draft Version 8.1 Clothes Washer Specification. NEEA is a non-profit organization representing an alliance of more than 140 Northwest utilities and energy efficiency organizations working on behalf of more than 13 million energy consumers. We encourage the development and adoption of criteria recognizing energy and water-efficient products that help consumers save on utility bills.

We strongly support the U.S. Environmental Protection Agency's (EPA) ENERGY STAR® program. ENERGY STAR is a critically important federal program created with bi-partisan support that annually delivers billions of dollars of energy savings to consumers and businesses. As such, ENERGY STAR's leadership in setting appropriate product specifications plays a critical role in advancing the efficiency of consumer products that meet experiential expectations and save consumers energy and money.

NEEA is pleased to see that EPA has proposed an update to the clothes washer specification expanding the scope to include combination all-in-one washer-dryers. NEEA supports the updated definitions of combination all-on-one washer dryers with air-only and water-cooled drying. Furthermore, NEEA supports all-in-one washer-dryer requirements to meet clothes dryers' performance requirements, specifically Sections 3 and 5 of ENERGY STAR Eligibility Criteria for Clothes Dryers with an exemption from the maximum cycle time specified in Section 3.A of the same specification.

NEEA is pleased to see that EPA continues to evaluate and revise connected criteria for clothes washers. We support including a reporting field to note if a product is network connected. Knowing how many products have connected functionality will help determine the savings potential for demand response programs. Products with open access and

energy consumption reporting can play a significant role in Smart Home Energy Management Systems and contribute to grid flexibility in the future.

We thank EPA for revising the criteria for this product category and publishing it for stakeholder input. We support the direction of this specification and look forward to future publication.

Sincerely,



Eric Olson
Sr. Product Manager
Northwest Energy Efficiency Alliance