



1111 19th Street NW ➤ Suite 402 ➤ Washington, DC 20036 t 202.872.5955 f 202.872.9354 www.aham.org

July 20, 2010

The Honorable Catherine R. Zoi Assistant Secretary Office of Energy Efficiency and Renewable Energy U.S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585

Dear Assistant Secretary Zoi:

The Association of Home Appliance Manufacturers (AHAM) and efficiency organizations, which are being coordinated by the American Council for an Energy-Efficient Economy (ACEEE), have agreed to a set of recommendations that should be addressed as the Department of Energy modifies the test procedure for clothes washers.

Please find these recommendations attached, and we look forward to working with your office as the test procedure rulemaking progresses.

Sincerely,

Kevin Messner

Vice President, Government Relations

AHAM

Steven Nadel

Executive Director

ACEEE

cc: Kathleen Hogan, Deputy Assistant Secretary for Energy Efficiency

Roland Risser, Program Manager for Building Technologies

Clothes Washer Test Procedure Changes Principles

Before finalizing a revised test procedure for residential clothes washers, the Department should:

- Gather or develop information on contemporary laundry practices in the US, including temperature settings, average cycles per year, special purpose machine cycles*, the size of a minimum laundry load, the size of an average load, and the frequency distribution of various laundry loads (load adjustment factor) for incorporation into the test procedure.
- Ensure that the test procedure does not contain any unwarranted bias in favor of large capacity washers.
- Extend Table 5.1 (Test Load Sizes) to a basket size of 6.0 ft³ (<u>specific edits will be provided</u>).
- Incorporate AHAM test cloth changes to improve the reproducibility (<u>specific edits</u> will be provided).

All of the above mentioned items shall be developed through DOE's current residential clothes washer test procedure rulemaking, to be completed by October 1, 2011, and applicable to the 2015 standard.

*Special purpose machine cycles include so-called "steam" cycles and periodic manufacturer-recommended non-laundry cycles for cleaning or deodorizing the laundry drum.