

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy  
National Consumer Law Center

March 7, 2025

Dr. Carl Shapiro  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
Building Technologies Office, EE-2B  
1000 Independence Avenue SW  
Washington, DC 20585

**RE: Docket Number EERE-2024-BT-TP-0009: Test Procedures for Residential and Commercial Clothes Washers and Consumer Clothes Dryers**

Dear Dr. Shapiro:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and the National Consumer Law Center (NCLC) on behalf of its low-income clients on the delay of effective date for the clothes washer and dryer test procedure final rule. 90 Fed. Reg. 9002 (February 5, 2025). We appreciate the opportunity to provide input to the Department.

**DOE should not further delay the effective date of the clothes washer and dryer test procedure final rule.** Over the last several years, clothes washer and dryer manufacturers have experienced supply shortages in the test cloth used for testing their products. In May 2024, the Association of Home Appliance Manufacturers (AHAM) sent a letter urging DOE to allow the use of alternate test cloth for clothes washer and dryer testing.<sup>1</sup> The January 2025 final rule, which allows use of an alternative test cloth and relaxes some of the test cloth requirements, provides more flexibility in the sourcing of test cloth for clothes washer and dryer manufacturers.<sup>2</sup> While this delay of effective date does not affect the compliance date of the amended test procedures, further delays would harm manufacturers by creating uncertainty and potentially limiting the allowable test cloth needed for testing clothes washers and dryers.

Sincerely,



Jeremy Dunklin, PhD  
Senior Technical Advocacy Associate  
Appliance Standards Awareness Project



Matt Malinowski  
Director, Buildings Program  
American Council for an Energy-Efficient Economy

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<sup>1</sup>[www.regulations.gov/comment/EERE-2024-BT-TP-0009-0001](http://www.regulations.gov/comment/EERE-2024-BT-TP-0009-0001)

<sup>2</sup>90 Fed. Reg. 5519, 5521, 5522 (January 17, 2025).

A handwritten signature in black ink, appearing to read 'Berneta Haynes', with a stylized, sweeping flourish at the end.

Berneta Haynes  
National Consumer Law Center  
(On behalf of its low-income clients)