



Department of Energy
Washington, DC 20585

August 29, 2012

VIA EMAIL

Ms. Mariah Steele
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Room 62023
Washington, DC 20460

Dear Ms. Steele:

The U.S. Department of Energy ("DOE") selected a General Electric Company ("GE") refrigerator-freezer, basic model PFSF5NFZ****, for testing as part of DOE's ENERGY STAR® Verification Testing Program. On April 6, 2012, DOE notified GE that the model did not meet the ENERGY STAR energy efficiency requirement for maximum permitted annual energy usage. DOE gave GE until April 27, 2012, to respond.

GE replied to DOE via email on April 20, 2012. GE argued that DOE did not test in accordance with the relevant DOE test procedure. In addition, GE noted that it had confirmed the validity of the energy testing that formed the basis of GE's certification and product labeling.

DOE has analyzed all of GE's claims regarding testing error and determined that only one is valid. GE correctly pointed out that DOE's test laboratory used the incorrect CT¹ defrost value. DOE has corrected this error and provided revised test reports to GE and EPA. DOE investigated all of GE's other claims and has determined that there were no other errors in DOE's testing or calculations.

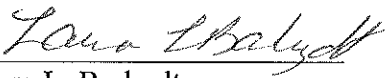
Based on DOE's test results, DOE has determined that GE refrigerator-freezer basic model PFSF5NFZ**** does not meet the ENERGY STAR efficiency requirement. Accordingly, DOE is referring this matter to the Environmental Protection Agency, the brand manager for ENERGY STAR.

¹ The "CT" value is the defrost timer run-time for a complete cycle, and is calculated using formulas in DOE's test procedure. For a variable defrost control model, the formula for CT is as follows: $(CT_L \times CT_M) / (F \times (CT_M - CT_L) + CT_L)$. See 10 C.F.R. Part 430, Subpart B, App. A1, § 5.2.1.3 (setting forth the formula and defining "CT_L", "CT_M", and "F"). Manufacturers provide values for CT_L and CT_M in their certification reports.



Please feel free to contact me at 202-287-5772 should you require any further information.

Sincerely,



Laura L. Barhydt
Assistant General Counsel
for Enforcement

Cc: Earl Jones, GE Appliances & Lighting
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