



**Department of Energy**  
Washington, DC 20585

April 18, 2012

VIA EMAIL

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

Dear Ms. Jones:

Kenmore-brand freezer model 253.16582104, manufactured by Electrolux Major Appliances North America ("Electrolux"), was selected for testing as part of the U.S. Department of Energy's ("DOE") ENERGY STAR® Verification Testing Pilot Program. DOE's initial testing, performed by a third-party lab on a single unit of this model, indicated that the model might not meet the ENERGY STAR energy efficiency requirement for maximum permitted annual energy usage. In accordance with DOE's Pilot Program procedures for conducting verification testing in support of ENERGY STAR (*see* [http://www1.eere.energy.gov/buildings/appliance\\_standards/pdfs/faq\\_final\\_december-2010.pdf](http://www1.eere.energy.gov/buildings/appliance_standards/pdfs/faq_final_december-2010.pdf)), DOE first obtained three additional units. In accordance with the same procedures, DOE then attempted to obtain four more units, but was only able to procure one additional unit.

On November 1, 2011, DOE notified Electrolux of the results of its testing and gave Electrolux twenty (20) days to reply. Electrolux responded to DOE via email on November 28, 2011, submitting a letter and various other attachments. In its response, Electrolux made a number of arguments that DOE need not address given the course of action recommended below.

DOE notes that Electrolux acknowledged, in an attachment to its November 28, 2011 email, that the adjusted volume value in its certification was based on CAD drawings. DOE's test procedures do not permit calculations of adjusted volume based on CAD drawings. DOE also notes that Electrolux would not have been able to qualify this model for the ENERGY STAR program using its test data and the DOE's third-party lab's calculated volume. Because Electrolux appears to have based its initial qualification of model 253.16582104 on testing not performed in accordance with DOE's test procedure, DOE suggests that it may be appropriate to have Electrolux re-qualify the model under current ENERGY STAR procedures.



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

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