Electrolux

20445 Emerald Parkway, SW – Suite 250
P.O. Box 35920
Cleveland, Ohio 44135-0920
Telephone (216) 898-1800
Fax (216) 898-2340

George E. Hawranko
Senior Associate General Counsel
(216) 898-2353
george.e.hawranko@electrolux.com

Via Electronic Mail: GC_comments@hq.doe.gov

Scott Blake Harris, General Counsel
Department of Energy
Washington, D.C. 20585

Re: Request for Comment on Large Capacity Clothes Washers

Dear Mr. Harris

Thank you for soliciting our input on retesting, re-certification and re-rating of large capacity residential clothes washers tested per an alternative procedure established under a waiver situation. Electrolux is pleased to submit these comments, and has also submitted a request for waiver and interim waiver to cover its large capacity units.

Test load sizes used in the test procedure to measure energy consumption are set forth in Table 5.1 of Appendix J1 of the Department of Energy's (DOE) regulations at 10 CFR part 430, subpart B. That Table stopped at a maximum capacity limit of 3.8 cubic feet, simply because that was the largest volume unit produced at the time the table was adopted. However, the basket volume and test load for clothes washers in Table 5.1 establishes a linear relationship between total clothes washer capacity and load size which is obviously extrapolatable to larger capacity units, making use of the updated Table the only logical way to accurately test. In fact waivers have been granted based on this linear relationship.

As to your specific question about retesting, so long as the manufacturer documents that it has tested the products in accordance with the actual basket volume of the unit, including where the volume exceeds 3.8 cubic feet, there should be no need to retest, recertify or re-rate any such unit, unless and until there is a component or design change that affects the energy use of the unit. In that case, the test load sizes would continue to be calculated for large capacity models in accordance with the extrapolated table. Volume calculations for top load and front load models should be consistent with DOE guidance.

If you have additional questions or we can assist you further, please do not hesitate to contact me.

Sincerely,

George E. Hawranko
Senior Associate General Counsel