

March 26, 2018

Via Email

Mr. Daniel Simmons
Principal Deputy Assistant Secretary
Department of Energy
Office of Energy Efficiency and Renewable Energy
1000 Independence Avenue, SW
Washington, DC 20585
ProgramDesign2017STD0059@ee.doe.gov

Re: Energy Conservation Standards Program Design Request for Information

Dear Mr. Simmons:

Thank you for the opportunity to comment on the Department of Energy's (DOE) Request for Information (RFI) on the Energy Conservation Standards (ECS) Program Design, published on November 28, 2017, under Docket No. EERE-2017-BT-STD-0059 and RIN 1904-AE11 (82 Fed. Reg. 56181).

Whirlpool Corporation is the world's leading manufacturer of major home appliances, with approximately \$21 billion in annual sales in 2017, 70 million products sold annually, 92,000 global employees, 22,000 employees in the U.S., and 70 manufacturing and technology research centers around the world. We sell major and small appliances under brand names such as Whirlpool, Maytag, KitchenAid, Amana, Jenn-Air, Consul, Brastemp, Bauknecht, and Indesit in nearly every country throughout the world.

As a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the joint association comments they submitted (under separate cover) on this RFI. **Please be advised that we support and echo the positions taken by the Joint Commenters, including the positions that the current ECS Program should be maintained with significant reform; and that market-based approaches to standards are unnecessary, burdensome, and costly to consumers and manufacturers alike.**

We greatly appreciate efforts like this from DOE to improve the ECS Program and offer additional compliance flexibilities for manufacturers. However, the current ECS Program is mature, and we have reached a point of diminishing energy and water savings for many appliances. There are also some inherent challenges and burdens in alternative, market-based approaches. A full program revamp is not needed. Instead, we recommend maintaining the current ECS program with significant reform to modernize it.

Sincerely,



Jason Schmidt
Director, Regulatory Affairs
Whirlpool Corporation