

Fisher & Paykel Appliances

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Assistant Secretary,
Conservation and Renewable Energy,
Department of Energy,
1000 Independence Ave, Washington, DC

Application for Interim Waiver and Petition for Waiver for App J and App J1 of Subpart B, CFR Part 430, Test Method for Clothes Washers with Adaptive Control.

Dear Assistant Secretary,

This application for an Interim Waiver and Petition for Waiver is submitted pursuant to 10 CFR 430.27, which provides for modification of the test method if the machine has characteristics that prevent it being tested to the relevant Appendix.

Clothes washers must be tested to App J for the EnergyGuide label and to App J1 for EnergyStar. Both these Appendices have a definition for Adaptive Control Clause 1.1. At the end of both of these definitions is a note stating that if a machine has adaptive control then a waiver to establish an acceptable test procedure, must be applied for.

Fisher & Paykel Appliances seeks to test its IW model washer to the DOE requirements and cannot do so as this model has adaptive control.

This waiver seeks to determine the equivalent of the Normal Cycle for J (and Energy Test Cycle for J1) and hence confirm the test cycle. Once this is determined then either J or J1 procedures can be applied as is and no deviations are sought in this waiver to either of the actual test procedures.

IW Washer Description.

IW is a vertical axis high efficiency clothes washer with 1000rpm spin speed. It is based on the GWL11 model that is currently marketed but has a different user interface. This model has 2 sensing modes:

- Water level sensing.
- Fabric sensing.