RCC Industry Panel – Energy Efficiency

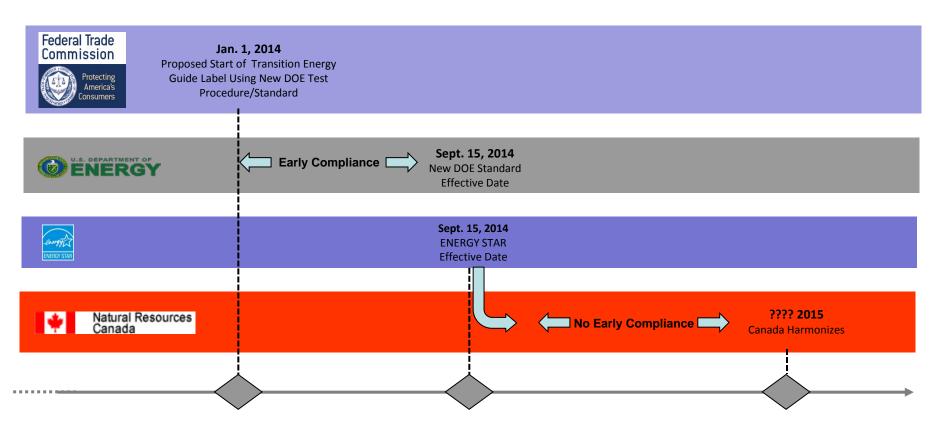
Presentation to RCC Stakeholder Dialogue Session June 20, 2013

Kevin Messner
VP of Policy & Government Relations
Association of Home Appliance Manufacturers

Warrington Ellacott Sr. Manager of Government Relations Whirlpool Canada

Timeline: Need for Canada Harmonization

Refrigerator Example



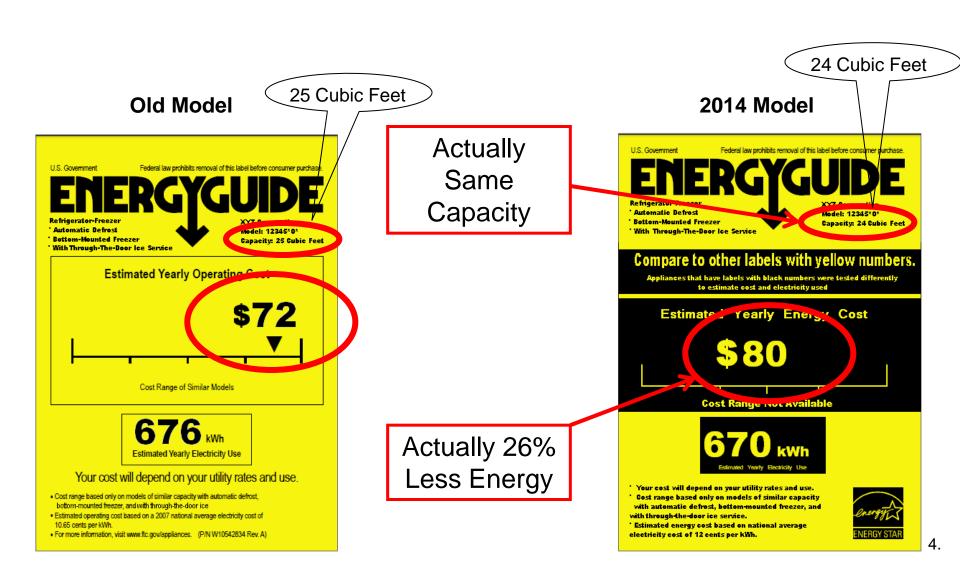
Systemic Issue: Washers, Dryers and Dishwashers Face Similar Challenge

Issue: Canada and US Regulators Not Moving in Unison No longer working

Opportunity: Harmonized Regulatory Development (DOE & NRCan)

Product	US	Canada
Clothes Washers	 ✓ New Test Procedure Annual Cycles Change (392-295) ✓ New Standard Standby included ✓ Effective March 2015 	✓ ENERGY STAR✗ New Test Procedure✗ New Standards✗ Effective Date?
Dryers	 ✓ New Test Procedure Annual Cycles Change (416-283) ✓ New Standard Standby included Lower rated energy ✓ Effective March 2015 	 ✓ ENERGY STAR ✗ New Test Procedure ✗ New Standards ✗ Effective Date?
Dishwashers	✓ New Test Procedure✓ New Standard✓ Effective May 2013	✓ ENERGY STAR✗ New Test Procedure✗ New Standards✗ Effective Date?

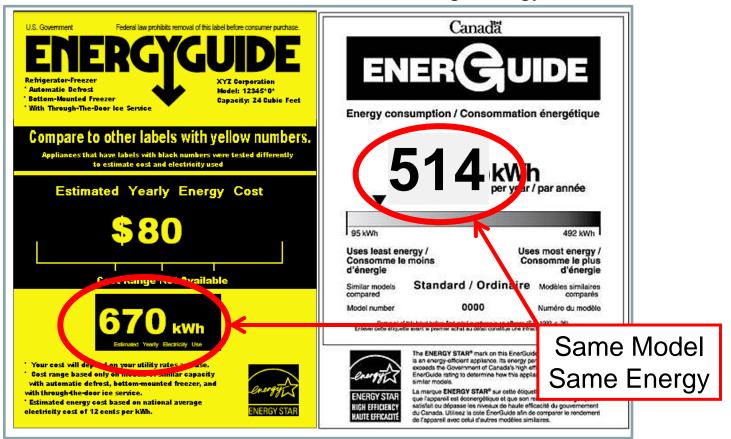
US Transition Label Complexity (Energy, Capacity, Cost of Electricity)



Double Sided Tag Confusion in 2014

Double-Sided Tag on Model With Ice Maker

New Standard Includes Ice Making Energy



Impact: Increased Costs & Consumer Confusion

Issue: Impact varies for each standard change

Costs: Financial, human, economic, time, credibility

Manufacturers	Retailers
Perform Energy Test	Update Store Website
Update Internal Systems (SAP)	Change Floor Pricing Tag
Facilitate Retailer Transition	Update Systems
Transition Manufacturing Materials	Change Point of Purchase Materials on Floor
Create New Energy Tags	Change Floor Energy Tags
Create New Point of Purchase Materials	
Update User Manual, Serial Tag, Product Documentation	
Change Brochures, Catalog of Products	
Update Systems	
Create and Submit Certification Documentation	

Recommendation to Improve Harmonization

Objective: Bi-national, Less Burdensome Regulatory Framework that Maintains a Vibrant North American Marketplace.

- 1. Immediately Allow Early Compliance in Canada to Align with ENERGY STAR and DOE Test Procedures/Standards.
- 2. Develop Transitional Label -- Harmonize with FTC.
- Develop Single Test Procedure Development (Incorporate By Reference).
- 4. Implement One-for-One Rule More Strategically to Reduce Cumulative Regulatory Burden.
 - The intent was to "identify irritants to business that stem from federal regulatory requirements...to reduce the compliance burden on businesses..."