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## **Comments to EPA on Commercial Dishwasher Specification Draft 2.**

April 26, 2007

Rachel Schmeltz  
c/o Rebecca Duff, ICF  
ENERGY STAR Program Manager  
Environmental Protection Agency  
Ariel Rios Building, SW, MS 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Rachel:

CEE appreciates the opportunity to provide comments on the ENERGY STAR specification for commercial dishwashers (Draft 2). This draft was reviewed by the CEE Commercial Kitchens Committee (the Committee) which includes CEE members that administrator energy-efficiency programs as well as program administrators from sponsoring water agencies. The Committee recognizes the impact that ENERGY STAR® has on the promotion of efficient products in the industry and applauds its efforts in addressing products that not only save energy but water as well.

We support the current Draft 2 specification as put forth on Monday, March 26, 2007. The following comments address two aspects for which we have recommendations on the implementation of the proposed specification.

### *Idle Energy Rate*

The Committee was pleased to see Draft 2 incorporate a criterion for dishwasher energy consumption through idle energy. While we accept that the idle energy rates must be based upon data attained from a small subset of equipment, the Committee expects the Environmental Protection Agency (EPA) to review the appropriateness of these levels in the near future when presumably more data will be available. Programs are interested in understanding if idle energy can be further differentiated with an additional tier level.

### *Flight Type Machines*

We note that the types of commercial dishwashers addressed in the specification include the majority of equipment represented in the marketplace; however, the Committee would like to recognize the energy and water savings opportunities to be realized by addressing Flight Type Machines. While we accept that it is not feasible to set an ENERGY STAR criteria due to the customized nature of flight type machines, the committee recommends that EPA provide guidance to consumers on how to consider energy and water performance when ordering such a piece of equipment. We will work with you and industry to find an appropriate metric for comparative purposes. We believe that EPA is in a unique position to do this through its marketing capabilities to increase consumer awareness through education.

Once again, CEE would like to thank the EPA for the opportunity to comment on the draft ENERGY STAR commercial dishwasher specification. We urge that EPA adopt this

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specification as soon as possible. These comments are also endorsed by the Supporting Organizations below. Please contact CEE Program Manager, Afroz Khan, at 617-589-3949, ext. 208 with any questions about these comments.

Sincerely,

A handwritten signature in black ink that reads "Marc J. Hoffman". The signature is written in a cursive style with a large, sweeping "M" and "H".

Marc Hoffman  
Executive Director