

**Steering Committee for Water Efficient Products
1001 Connecticut Avenue, NW Suite 801
Washington, DC 20036**

April 15, 2005

Richard H. Karney
Energy Star Program Manager
U. S. Department of Energy
Washington, DC 20585

Re: Proposed Changes to Energy Star Criteria for Clothes Washers

Dear Mr. Karney:

These comments are submitted in response to your notice of March 28, 2005, regarding the proposed 2007 criteria for Energy Star clothes washers. We co-chair a steering committee formed from over one hundred organizations, companies, water utilities, and public agencies that support a national voluntary water-efficient product labeling program modeled after Energy Star.

The March 28 proposal marks a major milestone for the Department of Energy, the Energy Star program, and the nation's water and wastewater utilities. For the first time, water efficiency as well as energy efficiency will be explicitly integrated into the eligibility criteria for the Federal government's premier voluntary market transformation program. We commend the Department for accepting the recommendations previously made by the Steering Committee and many others to adopt a water factor for Energy Star clothes washers. We also fully support the applicability of the criteria to family-sized commercial washers as well as to residential washers.

The DOE market analysis accompanying the March 28 proposal correctly notes that the inclusion of a water factor in the criteria opens the door to many potential new Energy Star partners by facilitating the use of the Energy Star program by water and wastewater utilities seeking to encourage greater water efficiency by their customers. We recognize that the proposed water factor of 8.0 will point consumers toward products with significantly improved performance, which is crucial for the water industry. Nevertheless, the Department is missing a major opportunity for further water savings and market transformation by not setting the 2007 water factor at 7.5, which would save, on average, an additional 550 gallons of water annually per machine, and is presently attained by 14 of the 15 manufacturers that currently produce products with a water factor of 8.0 or less. Many energy utilities as well as water utilities will be promoting a water factor of 7.5 or lower, and savings will be enhanced if Energy Star harmonizes at that level.

We also note that the Department's market analysis captures energy savings resulting from product end use, much of which is related to reducing consumption of heated water. However, energy savings associated with water system sources, conveyance, distribution, and treatment and wastewater collection and treatment can be readily estimated and are often significant. In future analyses, incorporation of these factors would better reflect the connection between water use and energy consumption and improve the valuation of potential water savings.

Finally, as more water and wastewater utilities become active Energy Star partners, it is reasonable to expect that there will be new interest in supplemental materials and information to help educate consumers about water-efficient products. We urge the Department to encourage the development of these new tools, and to remain open to consideration of an appropriate mark or extension of the existing Energy Star mark that will help convey the water efficiency message in the marketplace.

Again, we commend the Department for preparing this groundbreaking proposal, and we look forward to working further with the Energy Star Program in the future. Thank you for your attention to these views.

Sincerely,



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American Standard
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Al Dietemann, Co-Chair
Seattle Public Utilities
(206) 684-5881

cc: James A. Hanlon
Kathleen B. Hogan

10/25/2004

Steering Committee for Water Efficient Products

Edward R. Osann, Coordinator
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American Standard, Inc.	Natural Resources Defense Council
Association of Metropolitan Water Agencies	Office of the New Mexico State Engineer
City of Austin TX	Rain Bird Corporation
California Urban Water Conservation Council	San Diego County Water Authority
East Bay Municipal Utility District (CA)	Seattle Public Utilities
Eugene (OR) Water & Electric Board	Sloan Flushmate
Friends of the Earth	Southern Nevada Water Authority
City of Houston	Tacoma (WA) Public Utilities
Irrrometer Co., Inc.	TOTO USA, Inc.
Kohler Company	Utah Division of Water Resources
Maytag Corporation	Vitra USA
National Association of Home Builders	State of Washington
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