

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

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Potential Changes to Energy Star Criteria for Clothes Washers

General points regarding Energy Star designations for any water-using products

- Improving the efficiency of water use is an essential component of the national effort to close the water and wastewater infrastructure investment gap, which according to EPA may grow to levels of \$102 billion for water and \$122 billion for wastewater within 15 years.¹
- Designation of water using products by Energy Star should be done in consultation with EPA's Water Office and its new water efficiency market enhancement program.
- Water and energy efficiency should be encouraged through consolidated performance criteria and labeling for such products. Two different government programs establishing separate labels for the same product would have drawbacks that should be avoided.
- Energy Star eligibility criteria for water using products should include performance metrics for both water and energy, unless the water use is entirely hot water (as with dishwashers and pre-rinse spray valves) and a single metric can capture nearly all design options that save both water and energy.
- The Energy Star logo for such products should include an extender that conveys water efficiency.
- Potential water and energy savings should be a major factor in prioritizing products for labeling/listing.

Specific points regarding clothes washers

- A separately stated water efficiency metric (i.e., water factor) is needed.

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¹ See US Environmental Protection Agency, Office of Water, *The Clean Water and Drinking Water Infrastructure Gap Analysis*, September 2002, available for download through <www.epa.gov>.

Points regarding clothes washers (continued)

- Many clothes washer models achieve premium energy savings without achieving premium water saving, greatly complicating the efforts of water and wastewater utilities that seek to partner with energy utilities on customer incentives for high-efficiency machines.
- Several water utilities have provided customer incentives for high-efficiency clothes washers. More are likely to do so between now and 2007.²
- The water factor used for Energy Star eligibility in 2007 should convey the premium performance that water utilities seek to incentivize.
- An MEF of 1.80 and water factor of 7.5 (current CEE tier 3A) should be considered by DOE as a "rebuttable presumption" for further discussion and analysis as performance metrics for 2007 Energy Star criteria. A substantial number of manufacturers already produce models meeting these criteria, and many others are close enough to it that small adjustments will allow for attainment by 2007.

Edward R. Osann
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² The California Urban Water Conservation Council has recently adopted a revised Best Management Practice for clothes washer incentives that will obligate many water suppliers throughout the state to offer incentives for high efficiency machines over the next thirty months.

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American Standard, Inc.	Office of the New Mexico State Engineer
Association of Metropolitan Water Agencies	Rain Bird Corporation
City of Austin TX	San Diego County Water Authority
California Urban Water Conservation Council	Seattle Public Utilities
East Bay Municipal Utility District (CA)	Sloan Flushmate
Eugene (OR) Water & Electric Board	Southern Nevada Water Authority
Friends of the Earth	Tacoma (WA) Public Utilities
City of Houston	TOTO USA, Inc.
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National Association of Home Builders	Waterless Co. LLC