

August 18, 2005

Mr. Richard Karney
Energy Star Program Manager
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Washington, DC 20585-0121

RE: Final Comments on Potential Revisions to the Energy Star Criteria for Dishwashers

Dear Mr. Karney:

The Association of Home Appliance Manufacturers (AHAM) offers the following comments on the Department of Energy's *Market Impact Analysis on the Potential Revisions of the Energy Star Criteria for Dishwashers*, dated June 10, 2005. AHAM is a not-for-profit trade association representing manufacturers of major, portable and floor care home appliances, and suppliers to the industry. Our members represent the manufacturers of over 95% of the dishwashers sold in the U.S.

AHAM would like to recommend that any new Energy Star dishwasher specification be implemented in a two-phase manner considering the substantial potential changes to the specification that we address below. In order to provide for continuity in the program, and to ensure that the newly-enacted Energy Bill's tax incentive provision is properly implemented, we recommend that DOE establish an initial phase effective in 2007, as is required by law, and a second phase at a later date.

I. PHASE ONE SPECIFICATION

AHAM recommends that DOE Energy Star issue its initial dishwasher specification (i.e. *Phase One*), as required by law, effective in 2007. We recommend that in *Phase One* DOE only consider changes to the Energy Star criteria as measured using the current metric – Energy Factor (EF). *Phase Two* criteria could use different metrics, including Standby power, as discussed below.

Most importantly, DOE must establish an effective date for *Phase One* in 2007 as required by law. Implementation in 2007 would provide sufficient time for manufacturers to leverage current technology in revising their product lines and marketing strategies. Even though there may be several models in the marketplace that meet the new criteria, it is important

for DOE to consider the full market impact when revising the levels. This is recognized by DOE's efficiency standards programs where five-year lead times are prescribed.

Most importantly, AHAM opposes any prescriptive limit on the water use of dishwashers for Energy Star for Phase One because it is unnecessary. DOE correctly notes in its analysis that the more energy efficient the dishwasher, the less water the machine will use. Our analysis demonstrates that there is a general correlation between water and energy (on an industry aggregate shipment-weighted basis), as shown in the attached figure, even though there may be some outliers in the market. We also believe that there is some variance from manufacturer to manufacturer.

As a result, there is no need to limit water use as long as energy consumption is limited. If DOE is truly interested in reducing water use, a more effective way would be to help change consumer behavior by reducing pre-rinsing of dishware prior to loading the dishwasher. As DOE is aware from referenced studies in previous rulemakings, pre-rinsing is generally not necessary. In addition, AHAM data indicates that the current saturation level of dishwashers in U.S. homes is 59.3%.¹ Dishwashers use less water than hand washing – promoting dishwasher sales will help advance national energy reduction goals.

II. PHASE TWO SPECIFICATION

We recommend that further changes to the Energy Star dishwasher specification be considered in *Phase Two*. This phase could include changes to the measurement of energy consumption in these products by incorporating Standby power.

For instance, if DOE is to incorporate criteria for Standby power in these products, AHAM recommends that it be included strictly on the basis of the maximum total allowable product energy use expressed in kWh/yr, instead of a separate Standby power requirement measured in watts. Using the total product energy usage allows for the greatest flexibility in product design and innovation and covers both Energy Factor and Standby power.

Since Energy Star was created to promote energy conservation, the best approach is to consider the total kWh/yr rather than parsing out certain prescriptive aspects. As new features and controls are developed, Standby energy consumption could actually decrease total energy use or help reduce peak load use. Therefore, it would not be prudent to set a prescriptive limit of "X" watts Standby power, since the total kWh/yr can serve to limit both Standby and normal cycle energy use. We believe that this phased approach would allow our members to introduce advanced technology which would lead to significantly greater overall energy savings.

III. IMPLEMENTATION OF MANUFACTURER'S TAX CREDIT

The President signed the Barton-Domenici Energy Policy Act on Monday, August 08, 2005. This new law includes important energy-efficiency provisions, as well as tax credits for the production of energy-efficient dishwashers that meet the Energy Star specification, in effect

¹ See 2001 AHAM Saturation and Length of First Ownership Study, NFO Research, 2001.

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in 2007. In order for manufacturers to benefit from the dishwasher tax credit, the program must announce the 2007 dishwasher Energy Star specification by January 1, 2006 and it must be effective January 1, 2007² We expect that DOE will adhere to this legal requirement.

Thank you for the opportunity to comment on your analysis.

Sincerely,

A handwritten signature in cursive script that reads "David B. Calabrese". The signature is written in black ink and is positioned to the right of the typed name.

David B. Calabrese
Vice President
Government Relations

²

This requirement has been enacted as an amendment to the Energy Policy and Conservation Act as a new section 324A. This new section is to be codified after 42 U.S.C. §6294.

Dishwasher Energy and Water Trends

(AHAM shipment weighted avg. values)

