

January 17, 2006

Mr. Richard H. Karney, P.E.
US Department of Energy
Forrestal Building
1000 Independence Avenue, SW
Washington, DC 20585-0121

Dear Mr. Karney:

Re: Position of Natural Resources Canada on ENERGY STAR Dishwashers Criteria for 2007

Natural Resources Canada would like to thank you for the opportunity to comment on the proposed changes to the ENERGY STAR criteria for dishwashers.

Since 2001, the Government of Canada has been promoting the ENERGY STAR program, and the qualifying levels and specifications for most products, including major household appliances, have been identical to those promoted in the US. Manufacturers and distributors of appliances consider that the integrated nature of the American and Canadian ENERGY STAR initiatives is very important and provides a very coordinated approach for marketing and distributing products in both countries. Consequently, any substantial changes to the qualifying criteria to the ENERGY STAR program criteria would have a significant impact in this country.

The *Office of Energy Efficiency of Natural Resources Canada* agrees that the ENERGY STAR qualifying level for dishwashers should be raised from 0.58 to a value that will be feasible to achieve for industry, and, at the same time the ENERGY STAR label would more effectively assist the consumers to differentiate products in the marketplace, where presently approximately 92% of all available models are qualified ENERGY STAR products (*see Table 1*).

In response to a proposal to update the criteria for ENERGY STAR qualified dishwashers, we have reviewed our Canadian database of models for this product category. This database contains the information submitted by manufacturers and dealers of all models sold in Canada, as per their reporting requirements under Canada's Energy Efficiency Regulations.

It is our position that the level proposed will better differentiate the products that are presently on the market. *Table 1* summarizes the information on ENERGY STAR product model numbers that are available in the Canadian database as of January 1, 2006:

Table 1 - Canadian Database*

	<i>Number of Qualified Products</i>	<i>Average EF</i>	<i>%Total</i>
Total Products	686		
Standard	678	0.56	98.8
<i>ENERGY STAR</i>	<i>634</i>	<i>0.63</i>	<i>92.4</i>
<i>Non-ENERGY STAR</i>	44	0.48	6.4
Compact	8	1.06	1.2

*As of January 1, 2006

Table 2 illustrates the impact of the proposed new ENERGY STAR criteria (provided on December 20, 2005) on the qualified ENERGY STAR products available in the Canadian database. This table shows a significant drop in the number of qualified ENERGY STAR dishwasher models available in the Canadian market from 92% to 19% (change from 634 qualified items to 120).

Table 2 - ENERGY STAR Qualified Products*

	<i>Number of Qualified Products</i>	<i>Average EF</i>	<i>%Total</i>	<i>% Change</i>
Total Products	686			
ENERGY STAR	120	0.91	17.5	18.9
<i>Standard</i>	113	0.72	16.5	16.7
<i>Compact</i>	7	1.10	1.0	87.5

*based on the proposed new criteria (EF≥0.65 standard,, EF≥0.88 compact)

It should also be noted that the proposed new ENERGY STAR criteria will include most of the compact dishwashers presently available in the Canadian market.

Figure 1 shows a distribution of dishwashers available in the Canadian database for ENERGY STAR qualified products based on their EF and hot water consumption. In our opinion there is some correlation between EF and water consumption (water factor), however, a comprehensive study should be conducted to determine if the water factor should be considered as one of the qualifying criteria.

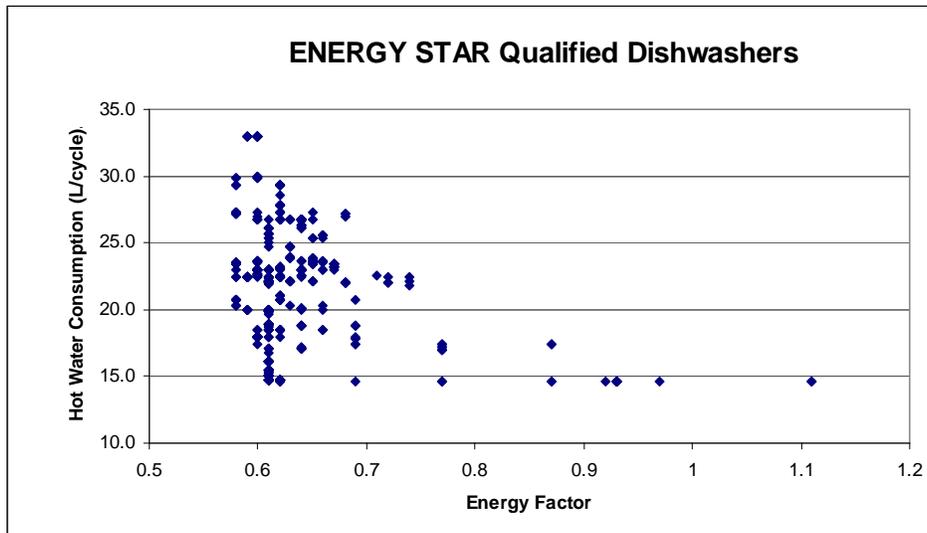


Figure 1 - Water consumption for ENERGY STAR qualified dishwashers

The inclusion of water factor to the ENERGY STAR criteria will however, provide an additional criteria to assist the consumer for product selection.

With respect to standby power, among 868 products available in the Canadian database, only 115 products are available for which information on standby power is available (*4 compact dishwashers and 111 standard dishwashers*). Based on the limited information available in our database, in *Figure 2*, approximately 84% of the products have a standby power *less* than 1 Watt.

It is our position that the standby power should be included in the ENERGY STAR criteria with the limits set to less than 1Watt.

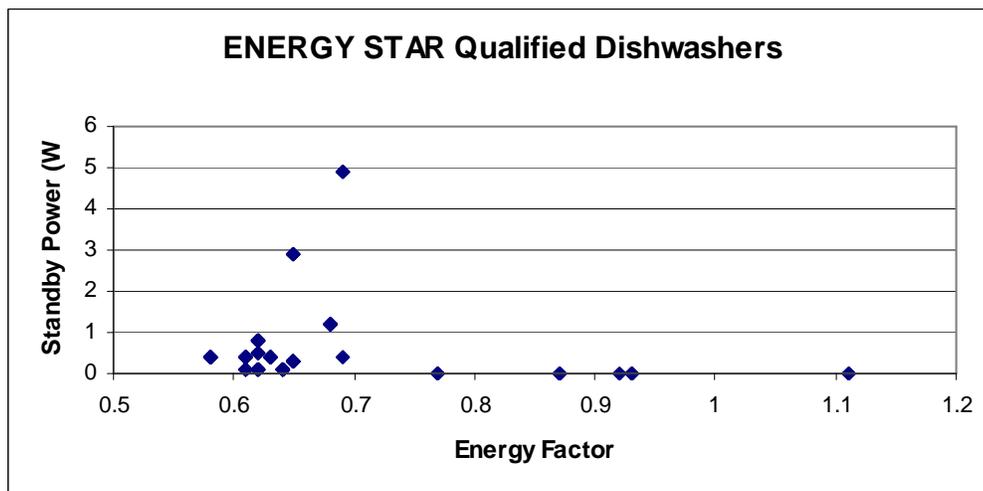


Figure 2 -Standby power for ENERGY STAR qualified dishwashers

We fully support the proposed launch of the educational campaign on avoid the use of tap water to pre-rinse dishes before placing them into the dishwasher. This campaign should help to educate consumers on the amount of water they can save by not pre-rinsing.

Thank you for your consideration of our comments.

Best Regards,

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cc: Katherine Delves
Anne Wilkins