

July 8, 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: 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.

Since changes to the Energy Star program for dishwashers could have a significant impact on AHAM member companies, we are providing these comments for your consideration. Our comments relate to three areas discussed in the Department's June 10, 2005 analysis, as follows:

1. **Standby Power**: If DOE is to incorporate criteria for Standby Power, AHAM recommends that it be included strictly on the basis of the maximum total allowable product energy usage in terms of kWh/yr, instead of a separate amount of Standby Power in terms of watts. Using the total product energy usage covers both Energy Factor and Standby Power, and thus allows for the greatest flexibility in product design and innovation.

Since the primary objective of Energy Star is to conserve energy, the best approach is to consider the total kWh/yr rather than parsing out certain prescriptive aspects. As new features and controls are developed, there may be a benefit for some standby energy consumption, which could actually decrease the total energy used or serve to reduce peak loads. 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.

2. **Water Use**: AHAM opposes a prescriptive limit on the water use of dishwashers for Energy Star, because it is unnecessary. DOE correctly notes in its analysis that the more

energy efficient the dishwasher, the less water the machine will use. This is clearly demonstrated in the embedded slide below, which shows the direct decrease in average water use of dishwashers as the average energy consumption has decreased.



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Since water and energy are directly linked, 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 and uses more water.

- 3. Effective Date:** Due to the success of Energy Star in helping to transform the market, it has become an integral part of manufacturers' marketing strategies. In order to continue its success, AHAM recommends that DOE establish an effective date of 24 months after the date in which the new criteria is finalized. This would provide sufficient time for manufacturers to revise their complete product lines and marketing strategies.

Even though there may be several models in the market place 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, which have 3 to 5 year lead times prescribed.

Thank you for the opportunity to comment on your analysis. Larry Wethje, AHAM's Vice President of Technical Services, will be formally presenting our views at the Department's workshop on July 13, 2005.

Sincerely,

A handwritten signature in cursive script that reads "David B. Calabrese".

David B. Calabrese
Vice President
Government Relations