



Together We Can Change  
National Markets

August 15, 2005

Richard Karney  
ENERGY STAR Program Manager  
US Department of Energy  
1000 Independence Avenue SW  
EE2J  
Washington, DC 20585

Dear Rich:

The CEE Appliance Committee (Committee) would like to thank the Department of Energy (DOE) for the opportunity to submit comments on the future ENERGY STAR dishwasher criteria. The following comments were developed by the Committee in response to information shared at the July 13 stakeholder meeting and are supported by the organizations listed below.

### **1. Energy Factor**

With regard to the Energy Factor component of the ENERGY STAR dishwasher criteria, the Committee would like to support the 0.65 EF level that General Electric (GE) and Maytag proposed at the recent stakeholder meeting in Washington D.C. This level currently constitutes 17% of products of available products, and is appropriately stringent given a January 2007 implementation date.

While the above recommendation is consistent with the previous Appliance Committee comment that DOE consider the 2006 CEE Tier 1 (0.62EF and 355 kWh/yr) as a starting point for deliberations, the current recommendation is more specific and actionable. The Committee believes that, given the 2007 effective date requested by dishwasher manufacturers, a higher EF is warranted. CEE plans to keep its specification in place throughout 2006 and to consider modifying Tier 1 upward upon DOE's announcement of the ENERGY STAR level.

### **2. Standby Power**

As in the Committee's initial comments, the group continues to recommend that DOE incorporate a 1W standby power component into the ENERGY STAR criteria for dishwashers. The Committee agrees with the comment made by the Association of Home Appliance Manufacturers (AHAM) that the best way to incorporate standby power is through the creation of a maximum annual kWh metric that would allow manufacturers the flexibility to innovate while meeting the standby power target.

It is the Committee's understanding that the average standby power use of a dishwasher is 8,500 hours per year. Therefore, to arrive at the maximum annual kWh, the Committee recommends that 8.5 kWh be added to the annual kWh associated with 0.65 EF. This yields a final kWh allowance of 339, as noted in the proposed criteria below.



### CEE Appliance Committee Proposal

	Energy Factor (EF)	Maximum Annual kWh
Proposed ENERGY STAR Criteria <i>Effective 1/1/07</i>	0.65	339

With regard to Whirlpool’s request to tie the ENERGY STAR specification to kWh only, the Committee has not modified its earlier position. While a kWh-only metric may have merit in terms of its simplicity, the Committee recommends that DOE maintain the EF component of the criteria, given that there is benefit to tying voluntary specifications to the metrics used in federal minimum efficiency standards. The Committee recommends that DOE carefully weigh the pros and cons of a kWh-only metric before separating the ENERGY STAR criteria from the metric used in federal standards.

### 3. Water

At the July 13 stakeholder meeting, CEE staff articulated an Appliance Committee request that DOE begin collection of information on water use of dishwashers (in gallons/cycle or another appropriate metric). Several manufacturers, with the exception of Maytag, expressed concerns with this data collection activity. While the Committee continues to believe that there is merit to collecting and publishing information on the water use of individual models, its primary interest in this matter is that the Department has enough information to make a determination on the merits of a potential water component during this revision cycle.

To this end, the Committee recommends that DOE begin collection of the following data immediately to inform its deliberations:

- The correlation coefficient on the relationship between water use and energy use
- The standard deviation on this relationship
- A scatter plot of currently available dishwashers (with no reference to manufacturer or model number) that demonstrates the extent of variation in water performance at given EF levels

This information would be most useful if it were limited to models above 0.62 EF, as that is the minimum value that was discussed during the stakeholder meeting. By limiting the field of models to this degree, the Committee believes that a more accurate representation of the relationship between water and energy in high-efficiency dishwashers can be achieved.

### 4. Performance Testing

In its presentation at the recent stakeholder meeting, Maytag proposed the inclusion of a performance test in future versions of the ENERGY STAR dishwasher criteria. While the Committee supports DOE’s consideration of this proposal, it believes that tracking of consumer complaints regarding ENERGY STAR-qualified dishwashers is a necessary first step. The



potential burden to industry of incorporating performance testing would be difficult for DOE to justify without documenting whether, and the extent to which, a problem currently exists.

### **5. Expansion of ENERGY STAR Scope to Include Compact Dishwashers**

The Committee carefully discussed Fisher & Paykel's petition to expand the ENERGY STAR scope to include compact dishwashers, and identified lack of information about the compact dishwasher market and technology as a hurdle to offering (or declining) support for the recommendation. As a result, the Committee developed a list of recommended questions for DOE to consider as it weighs the Fisher & Paykel request.

These are:

- How large is the market for compact dishwashers?
- Are all compact dishwashers, e.g. countertop units, able to be tested under the existing federal test procedure?
- Would it be appropriate for compact units to be incorporated into the program at the same specification level as standard units? Would they require a separate level?
- What are the potential per unit and national aggregate energy savings associated with incorporating compact units?
- What is the level of the Department's time and resources that would be required to incorporate (and maintain) the label for compact dishwashers?

### **6. Dishwasher Width and Capacity**

In response to both Maytag and GE comments at the stakeholder meeting, the Committee discussed the need to consider subsets of standard dishwashers within the ENERGY STAR criteria revision. The manufacturers suggested that these subsets could include models with less than 12 place settings vs. more than 12 place settings or models that are 18" wide vs. 24" wide. The Committee requests that DOE look more closely at currently available models to determine whether continuing to view the standard dishwasher category holistically is a problem, and if so, how large a problem. The Committee believes that additional information is necessary before DOE takes any action to separate the criteria into subcategories.

Thank you again for the opportunity to comment. The Committee looks forward to the release of the draft criteria in late September, and plans to submit additional comments on DOE's proposal. If you have any questions about these comments, please direct them to Rebecca Foster, CEE Residential Program Manager at (617) 589-3949 ext. 207.

Sincerely,

Marc Hoffman  
Executive Director



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### **Supporting Organizations**

Efficiency Vermont

Long Island Power Authority

Natural Resources Defense Council

New York State Energy Research and Development Authority

Northeast Energy Efficiency Partnerships

Northwest Energy Efficiency Alliance

NSTAR

PacifiCorp

Pacific Gas & Electric

Sacramento Municipal Utility District

San Diego Gas & Electric

Southern California Gas Company

United Illuminating