

January 17, 2006

Mr. Richard H. Karney
Energy Star Program Manager
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Subject: Comments on Proposed Energy Star Criteria for Residential Dishwashers

Reference: Letter dated January 17, 2006 to Mr. Richard Karney from the Steering Committee for Water Efficient Products

Dear Mr. Karney:

The California Urban Water Conservation Council, whose 350 members are comprised of 194 water utilities and municipalities in California as well as 31 environmental organizations, strongly supports the position and recommendations expressed in the referenced letter from the national stakeholder group.

In particular, we place a very high level of importance upon the inclusion of a water factor within the Energy Star criteria. As was demonstrated with clothes washers, energy efficiency does NOT necessarily correlate with water efficiency. We believe that BOTH resources deserve attention within the Energy Star metrics.

It is well documented that energy and water are inextricably linked in a number of ways: with the generation of electricity, with the delivery and treatment of water and wastewater and, finally, at selected end uses within homes and business. This fact must be recognized through Energy Star, because water use reduction leads directly and indirectly to reductions in electricity consumption as well. Dishwashers of all types (residential and commercial) represent one of the key appliances for which hot water use is emblematic of that linkage.

Furthermore, performance testing of products is a critical prerequisite of water use efficiency programs implemented throughout the U.S. As such, we also strongly urge the Department to consider and include a rigorous performance metric within Energy Star for dishwashers. This will provide consumers with the assurance that the product that is listed as energy- and water-efficient also performs to their expectations in the home and business.



455 Capitol Mall
Suite 703
Sacramento
California 95814

PHONE
916/552-5885
FAX
916/552-5877

www.cuwcc.org

As an organization representing water utilities and their customers throughout California, we stand ready to help you in achieving these goals for the Energy Star program at the Department. Please contact me if we can be of ongoing assistance.

Very truly yours,



Mary Ann Dickinson
Executive Director