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EnergyStar for Compact Dishwashers.

Fisher & Paykel Appliances is proposing that EnergyStar should be extended to include compact dishwashers. (Compact dishwashers are currently defined as having a capacity of less than eight place). There are a number of reasons for this:

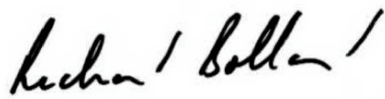
1. EnergyStar should be including compact dishwashers in their program as such product can save considerable energy and water. Failure to have EnergyStar on smaller dishwashers will sometimes, unnecessarily drive customers to purchase larger, more energy consuming products.
2. Compact dishwashers are a growing sector of the market and are potentially very good energy saving products. It is a sector of the market that DOE needs to be aware of and promoting when appropriate.
3. There is a growing segment of the market where households are small and a large dishwasher is simply inappropriate for the size of the residence and the number of people living there.
4. There is also a more affluent segment of the market that is installing multiple dishwashers. There may be a standard size and a compact size dishwasher in the kitchen, plus the games/recreation room will have an additional compact model. EnergyStar should provide guidance for such selection of premium products.
5. There is a growing trend in kitchen and appliance design for modularization of appliances. Many homes are moving from single large appliances to multiple smaller appliances in more appropriate locations for improved ergonomics and convenience. For Energy Star to continue being a symbol of the most efficient, best and most innovative appliances, it needs to incorporate compact dishwashers as part of its program.

Our initial research comparing DishDrawer use with regular dishwasher use is suggesting that consumers use single drawer dishwashers much more efficiently (with increased capacity utilization) than they do in a regular dishwasher. While additional research is needed to fully confirm that compact dishwashers have additional use related efficiencies over standard dishwashers, we believe that compact dishwashers will prove to be both an efficient dishwashing method, and help keep the Energy Star label as a mark for premium products.

Possible Options:

- 1 DOE create a Compact Category within EnergyStar and set suitable criteria.
- 2 Amend the definition of compact from “less than 8 place settings” to “less than 6 place settings”. This would allow the Fisher & Paykel single DishDrawer to be classed as a standard dishwasher and so qualify for EnergyStar if eligible. This would still class the smaller ‘benchtop’ units as compact.
- 3 Change the classification of dishwashers from standard and compact to a system based on place settings and have EnergyStar criteria based on energy/place setting.

Fisher & Paykel Appliances looks forward to discussions with DOE over the implementation of EnergyStar category for compact dishwashers. Please feel free to contact us if you require any further information.



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