

From: [Russ Payzant](#)
To: ENERGYSTARVerificationProgram@energystar.gov;
Subject: comments
Date: Friday, May 28, 2010 3:30:20 PM

Comments from American Dish Service
On the Energy Star Verification Program
By Russell L. Payzant

I attended the Energy Star stake holder's meeting on 5/24/2010 held at the NRA show in Chicago. Our company was hoping to get some clarification on the announced revision to Energy Star's Commercial Food Service program as it affects commercial dishwashers. As a result of the comments made by the presenter Christopher Kent, we are only more concerned with what is being said. We were also told that the exact or completed document we were to comment on was not available as of the meeting. With a deadline so close, it is hard to imagine that enough qualified comments could be made.

So as a manufacturer of commercial dishwashers, we think this is what you are saying. The congress has received complaints that the Energy Star brand is not a valid guide to energy saving equipment. The congress has mandated, we are told, that steps will be taken to improve the perception of the brand. The perception is that Energy Star marked appliances are either inefficient or do not work as well as regular models. Something called "greenwashing" is taking place by unscrupulous companies and the public is losing confidence in the program.

We were told that EPA (and in some way DOE) would take

on the responsibility of verifying the verification of third-party test laboratories. At the meeting it sounded like the agencies such as UL, NSF, ETL, and others would be certified by the EPA. Further, it will require some manner of insuring testing personnel do not later become employed by those companies they were testing equipment for. There was no elaboration, it would be decided later by the Assistant Administrator Jean McCarthy (I think that was the name).

The bulk of the meeting was taken up by those topics. Yet the item of most concern to us was not explored because it had not yet been finalized. The requirement was to retest equipment after a model had been tested and accepted by Energy Star. We think you were telling us that EPA or some agency of the EPA would do random testing of models purchased in the market place, which the manufacturer will be charged for. It was said that this could be done up to three years after purchase. These models would be examined to see if they were performing according to the test results which certified the model. How likely would any appliance be performing at test laboratory levels after three years service? This is an astounding pronouncement that must not have gone through any consensus review.

If this is done per model listed with Energy Star over a period of three years, and failure of the test could result in fines, readmission, or removal of the mark, and the manufacturer were responsible for the costs, then the program is unsustainable. The benefit of having the mark vs. the cost of supporting the program would not balance.

Added to this is the cost of supporting an ISO 1725 program for quality transparency, the impact on a small business is overwhelming. As it is, the development of such equipment, the field support needed and the cost of supporting the brand has not shown the payback advertised in the initial meetings held by Energy Star. Before we see any benefit to carrying such models, we are now told of a revision that will increase the cost many fold. We saw no good news from the meeting and are hoping we just misunderstood what was presented.

One individual at the meeting said that his customers knew he had an efficient product and would continue to use that with or without the Energy Star mark. He could not see the value of the Energy Star brand off-setting the cost of the program. We have to agree with his sentiment.

Sincerely,
Russell Payzant
ADS Engineering
American Dish Service

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