

**Steering Committee for Water Efficient Products
1001 Connecticut Avenue, NW Suite 801
Washington, DC 20036**

April 23, 2007

Ms. Rachel Schmeltz
Energy Star Program Manager
Office of Air & Radiation
US Environmental Protection Agency
Washington, D.C. 20460

Re: Draft 2 Specification for Commercial Dishwashers

Dear Ms. Schmeltz:

We co-chair a steering committee formed from over one hundred organizations, companies, and water utilities that support the voluntary water-efficient product labeling programs administered by the U.S. Environmental Protection Agency (EPA). Thank you for the opportunity to provide feedback on the Draft 2 Energy Star Specification for Commercial Dishwashers.

1. **Product Categories.** While we support the categories of machine types proposed for Energy Star eligibility in Draft 2, we recommend that EPA remain open to coverage of glassware machines and flight type machines in future revisions to this specification, and give notice to that effect. Regarding flight type machines, there appears to be a wide variance in their water consumption, and although they represent a small percentage of the installed base of dishwashing equipment, their large size means that they are responsible for a larger proportion of energy and water consumption devoted to commercial dishwashing. Their custom design may pose a special challenge for drafting performance specifications, but one that should not be insurmountable. This subcategory should be evaluated during future revisions of the specification.
2. **Water Efficiency.** We strongly support the use of the water consumption as determined under the NSF test procedure for determining eligibility for Energy Star. Water consumption is a reasonably good surrogate for most energy consumption in commercial dishwashing equipment, as well as being an important measure of machine efficiency in its own right. The newly proposed idle energy requirement complements the water consumption requirement by encouraging energy-saving features that might otherwise not be encouraged by the water consumption metric alone.
3. **Energy idle limits for multiple tank machines** should be reconsidered to adjust for total volume of the tank(s).

4. The draft specification should establish a consistency in significant figures and /or decimal rounding of the results.

Commercial dishwashers offer an exciting opportunity for energy and water savings, and we strongly support the development of an Energy Star specification for these products. Thank you for your attention to these views.

Sincerely,

Handwritten signature of Peter DeMarco in black ink.

Peter DeMarco, Co-Chair
American Standard
(732) 980-3472

Handwritten signature of Al Dietemann in black ink.

Al Dietemann, Co-Chair
Seattle Public Utilities
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