



# City of Austin

Water Conservation Division, Austin Water Utility  
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July 8, 2005

Richard H. Karney, P.E.  
U.S. Department of Energy  
ENERGY STAR Program Manager

RE: Comments on ENERGY STAR Dishwasher Rule Criteria

Dear Mr. Karney:

Water conservation is an essential part of Austin Water Utility's long-range water supply strategy and energy efficiency is an important component of Austin Energy's supply strategy. The development of new specifications for dishwashers provides an opportunity to increase water and energy efficiency for Austin consumers as well as those across the country.

In order not to exceed our water supply as the population increases, Austin plans to reduce water demand 50,000 acre-feet by 2040 through a combination of conservation and reclaimed water programs. Austin has made significant investments in water efficiency through rebate, audit, regulatory and education programs.

One of Austin's strategies for water efficiency is to reduce indoor use by having customers replace dishwashers that are not water efficient with efficient models. Unfortunately, the current ENERGY STAR criterion does not include a water factor that would allow customers to select the most water efficient dishwasher with the same ease as they would an energy efficient model. Customers must do their own research, relying on whatever information is available from utilities, appliance manufacturers or Consumer Reports to determine which washers are water efficient.

The ENERGY STAR marketing program has been effective in differentiating many energy efficient products in the marketplace. This has not been the case for ENERGY STAR-labeled dishwashers, since over 80 percent of dishwashers meet the current specifications. Revising these specifications provides an opportunity for a true differentiation of efficient dishwashers.

ENERGY STAR dishwasher standards that are limited to energy specifications will alienate customers whose primary focus is water efficiency, ultimately reducing the value of the ENERGY STAR label. Conversely, by including both water and energy efficiency criteria (and adding a logo extender to convey water efficiency), the ENERGY STAR program would broaden its reach and substantially increase its market influence for all efficient products.

Consolidated performance criteria and labeling will encourage the use of both water and energy efficient products. ENERGY STAR should take the lead in unifying standards by including water and energy performance metrics for products that use both, in consultation with EPA's Water Office and its new water efficiency market enhancement program. Without a joint effort, these different government programs will likely establish separate labels for the same product – a prospect that would be confusing for customers, retailers and manufacturers.

When establishing these new standards, we urge you to consider the amount of water and energy used in the pre-rinse cycle. Since pre-rinsing dishes in the sink is very inefficient from both a water and energy standpoint, customers are being advised to scrape dishes and put them in the dishwasher without rinsing. However, some customers will still want to pre-rinse these dishes if they are not going to run the dishwasher until it is full. Therefore, we need to assume or determine through research how much water and energy is consumed by the pre-rinse feature and how often it is used. (If such research has already been done, it should be publicized.) The resulting calculations for the water and energy consumption of each

machine during the pre-rinse cycle should be added to the normal wash cycle consumption and considered when rating the efficiency of the dishwasher.

The following example assumes that a pre-rinse cycle using 2 gallons and 100 kWh is operated 112.5 times per year and that the full cycle is used at the DOE average rate of 215 times per year. Based on these assumptions, one-half of these pre-rinse water and energy amounts would be added to the average for each wash cycle.

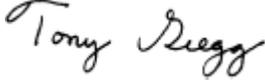
	<b>Water</b>	<b>Energy</b>
Dishwasher water and energy use per cycle:	6.0 gal.	350 kwh
Dishwasher pre-rinse water and energy use:	<u>1.0</u>	<u>50</u>
<b>Totals:</b>	7.0 gal.	400 kwh

Finally, ENERGY STAR needs to educate consumers about the water and energy wasted by pre-rinsing dishes in the sink before putting them in the washer. As part of the eligibility criteria, ENERGY STAR should require manufacturers to include information about pre-rinsing in manuals and other materials packaged with the machines, as well as in point of purchase information.

The Austin Water Utility strongly urges you to include a water factor in the ENERGY STAR criteria for dishwashers. We recommend setting a water factor of not greater than 6.0 plus the average pre-rinse water use and an Energy Factor of at least 0.62 before factoring in the pre-rinse energy use.

Thank you for the opportunity to submit comments. If you have any questions, please contact me at (512) 974-3557.

Sincerely,



Tony Gregg, P.E.  
Water Conservation Division Manager  
Austin Water Utility