



City of Seattle

Gregory J. Nickels, Mayor

Seattle Public Utilities

Chuck Clarke, Director

July 11, 2005

Richard Karney
ENERGY STAR Program Manager
US Department of Energy
1000 Independence Avenue SW
EE2J
Washington, DC 20585

Dear Mr. Karney:

Thank you for the opportunity to provide comments on the Potential Revision of the ENERGY STAR Criteria for Dishwashers. I have attached my comments in the form of a power point slide package with I intend on presenting on at the meeting in D.C. on July 13th. These comments were made in consultation with our Energy Utility, Seattle City Light.

Both utilities support the CEE's recommendations on dishwashers dated July 8, 2005. Seattle Public Utilities is also asking DOE to consider the addition of a water consumption requirement. Market research and manufacturer ads both reflect the fact the many customers are seeking water efficiency AND energy efficiency when they purchase a new dishwasher. By including a water requirement, DOE can leverage water and wastewater utilities as new Energy Star dishwasher partners. In addition, since vast amounts of energy are used for water pumping and treatment, end use water efficiency translates to additional energy savings for the nation.

If you have further questions please contact me at (206) 684-5881.

Sincerely,

Al Dietemann
Water Conservation Lead
Seattle Public Utilities

Attachment

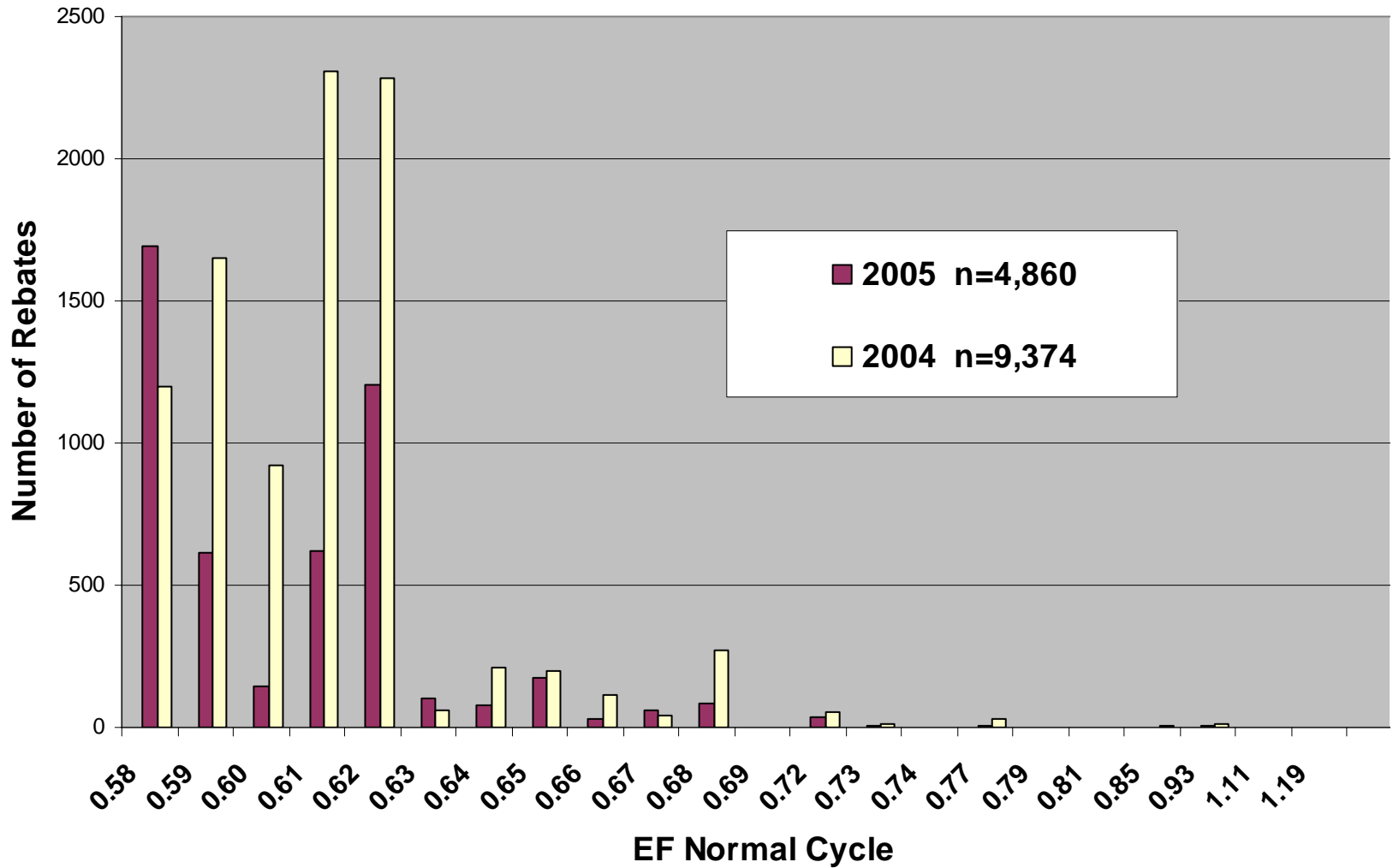
Seattle Public Utilities
Energy Star Dishwasher
Recommendation:

0.62 EF and 6.1 gallons/cycle

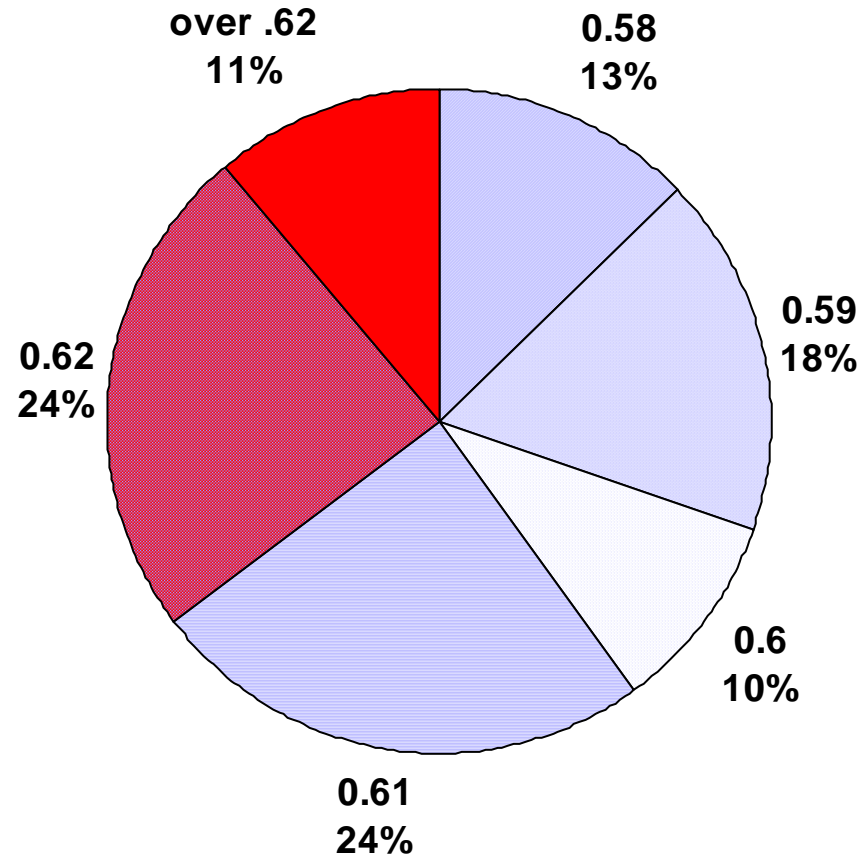
Al Dietemann

July 13, 2005

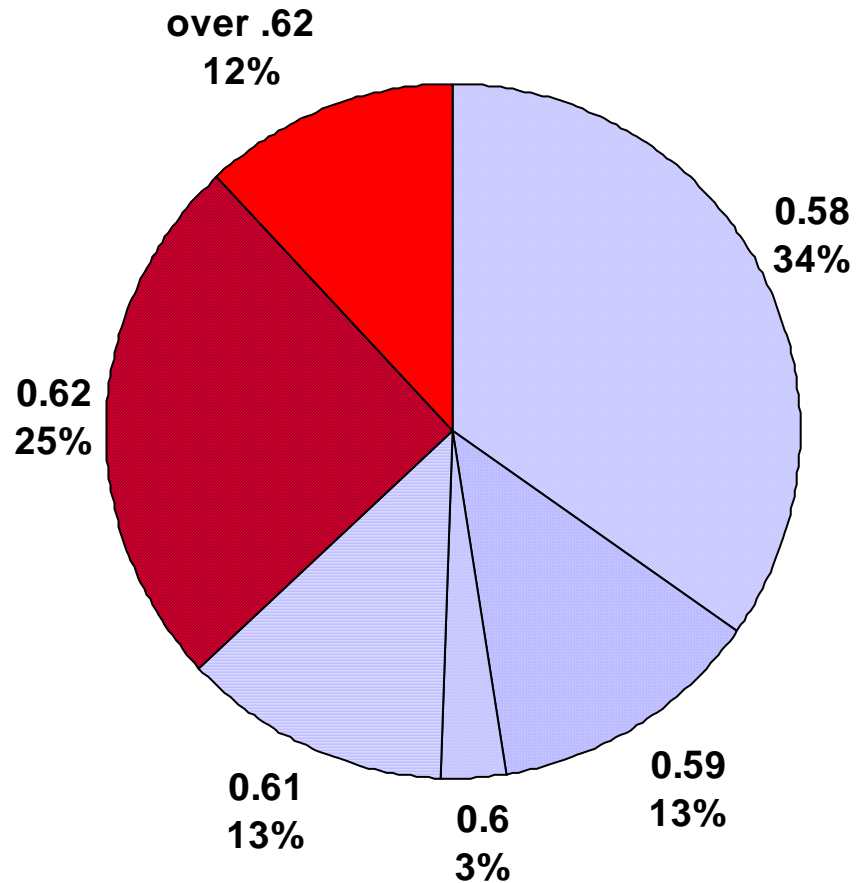
Distribution of Energy Star Dishwashers Rebated in Washington State in 2004 and 2005 (to date)



**EF Distribution in 2004 n = 9,374
for Energy Star Dishwashers Rebated in Washington State
35% had EF of 0.62 or above**



**EF Distribution to date in 2005 (Jan-June) n = 4,860
for Energy Star Dishwashers Rebated in Washington State
37% had EF of 0.62 or above**



**Dishwashers Rebated in Washington State
with an EF of 0.62 or above:**

16 Different Manufacturers

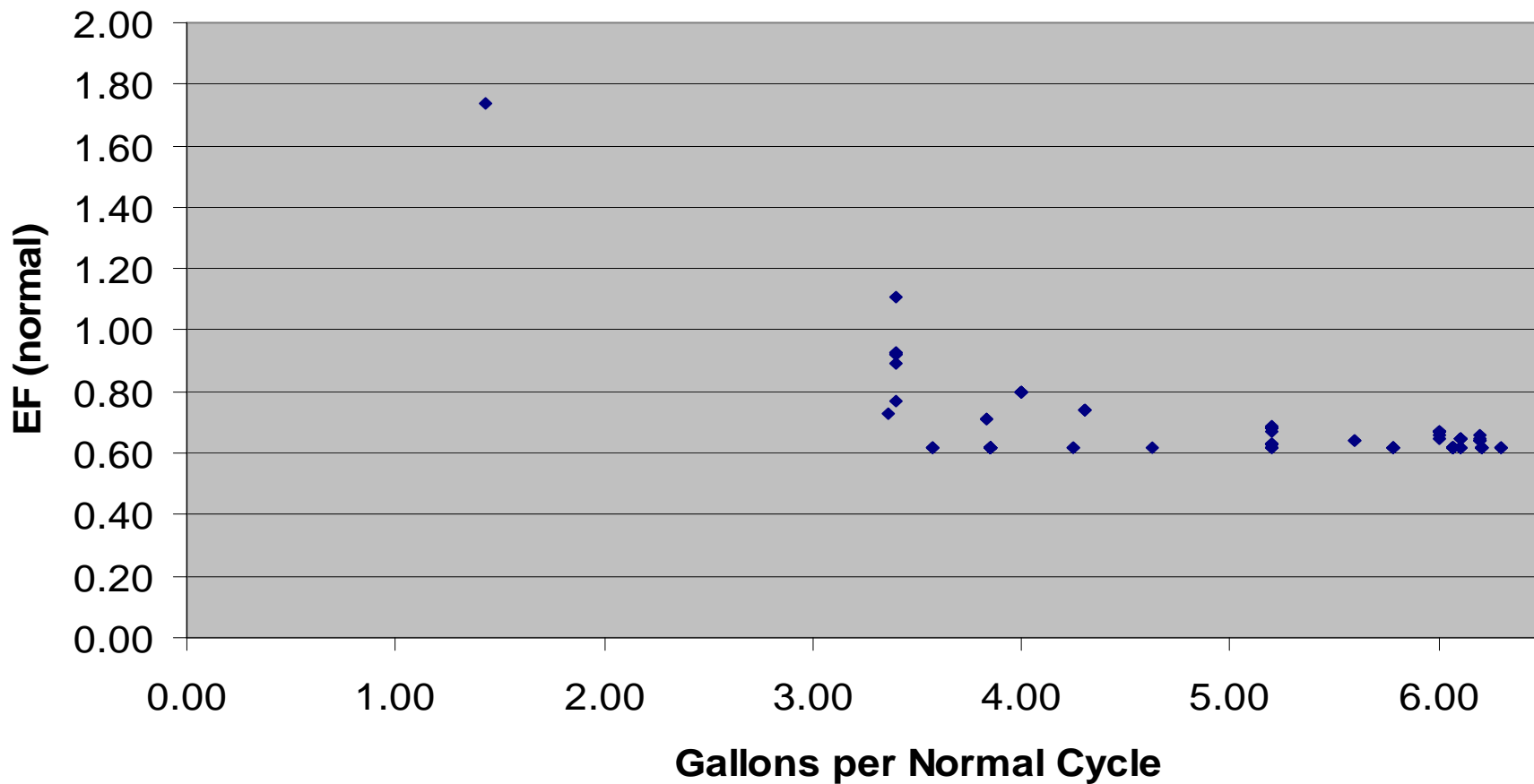
comprised of

72 Different Models

Use an EF of at least 0.62
to keep Energy Star a “Premium Label”
and adopt this as soon as possible
(consider future phasing)

Seattle’s Water and Energy Utilities
both support CEE’s 0.62 EF and
water use reporting recommendations

**EF and Water per Cycle for Dishwashers with
EF of 0.62 or greater (n = 164 models)
(Note: many models overlap with same EF and WF)
(data source: Oregon Dept of Energy)**



**Of the 30 dishwasher manufacturers
having an EF of 0.61 or above
currently listed by the
Oregon Dept. of Energy,**

*28 manufacturers have models
using 6.1 gallons per cycle or less.*

Of the 164 dishwasher models listed by the Oregon Dept. of Energy for tax credits having an EF of 0.62 or higher,

Only 18 models use more than 6.1 gallons per cycle

This represents less than 11% of models -

However, only 2 manufacturers
(Monogram and Siemens)

don't offer at least one model using 6.1 gallons per cycle or less.

ADDITIONAL COMMENTS:

Compact and single drawer dishwashers should be added to Energy Star.

Dish cleaning performance should be an Energy Star consideration.

Maximum per cycle energy and water consumption data for each machine should be reported.

Energy and water use data comparing machine pre-rinsing and hand washing should be analyzed.



Conclusion:

6.1 gallons per cycle and 0.62 EF will allow almost all dishwasher manufacturers to have one or more Energy Star Models

Reporting of water use per cycle by manufacturers should be an Energy Star requirement

Energy Star should encourage smaller capacity dishwashers, full loads, and less pre-rinsing to save additional energy and water