



City of Austin

Water Conservation Division, Austin Water Utility
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October 15, 2004

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

RE: Comments on ENERGY STAR Clothes Washer Rule Criteria

Dear Mr. Karney:

Water conservation is an essential part of Austin's long-range water supply strategy. In order not to exceed our water supply, Austin plans to reduce water demand 50,000 acre-feet by 2040 through a combination of conservation and reclaimed water programs. Austin has already made significant investments in water efficiency rebate, audit, regulatory and education programs.

One of our key strategies is to reduce indoor use by replacing inefficient clothes washers with efficient models. Efficient machines already on the market reduce water use by 15-25 gallons per day per home, saving up to 9000 gallons annually per home.

So far, the City has offered rebates to encourage customers to choose water-efficient washers. Customers have had to rely on information from the City or from appliance retailers to educate them about which washers are water efficient. The ENERGY STAR marketing program has been effective in differentiating many energy-efficient products in the market place, including clothes washers.

However, the current ENERGY STAR clothes washer standards actually do customers a disservice in differentiating only those washers that save energy. Consumers who have heard about the water efficiency characteristics of new washers often mistakenly think ENERGY STAR washers are also water-efficient. Since this is not necessarily true, it has added considerable confusion to the marketplace.

At the Stakeholders' meeting on August 31, 2004, there appeared to be agreement that water factor (WF) criteria should be added to ENERGY STAR. Since many currently available clothes washers would meet a 7.5 WF standard (and many more will be on the market by 2007), many water utilities and other organizations support this WF level for implementation in 2007.

The Austin Water Utility would strongly urge you to accept this recommendation and set a WF of 7.5 for inclusion in ENERGY STAR requirements in 2007. This standard would greatly help Austin and many other utilities meet our long-term water needs.

Thanks 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