



**DEPARTMENT OF
ENVIRONMENTAL
PROTECTION**

59-17 Junction Boulevard
Flushing, New York 11373

**Christopher O. Ward
Commissioner**

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

October 15, 2004

Dear Mr. Karney:

The New York City Department of Environmental Protection (DEP) is one of the largest suppliers of potable water in the nation and is also responsible for managing the City's 1.5 billion gallon daily wastewater stream. Because of the City's dependence on water, DEP has been a strong advocate of water conservation and the use of water saving appliances, fixtures, and other appurtenances. Given the challenges of managing such a vast water supply and our ongoing efforts to encourage water conservation, DEP strongly endorses the 2007 ENERGY STAR clothes washer criteria.

DEP helps publicize the ENERGY STAR program through bill inserts and educational materials independently and in association with the New York State Energy Research and Development Authority. ENERGY STAR efficiency levels also serve as guidelines for one of the rate programs provided to New York City water supply customers, the Multifamily Conservation Program. In this way, DEP supports and has a stake in the future of the ENERGY STAR program.

Based on estimates provided by the Consortium For Energy Efficiency, the new criteria could provide an annual savings of nearly 6,000 gallons every year for each individual washer sold using the proposed ENERGY STAR criteria. Given that the New York City water supply serves more than nine million people, the translated water savings could potentially be enormous over the long term. Furthermore, as the City continues to maintain and upgrade its fourteen wastewater treatment plants, the reduced flows entering these plants could reduce the overall cost of operations there as well.

Ultimately, the benefits realized by the City from the reduced draw on its water supply and the reduced inflow into its wastewater treatment plants are cost benefits that are passed on to the nine million customers of the water and sewer system. That is why the proposed ENERGY STAR clothes washer criteria provide a net benefit for virtually all stakeholders in the water and wastewater systems. While washing machine cost considerations and



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other technical issues related to meeting the new standards are important, these concerns should be considered and integrated into the proposed standards, but should not be a deterrent to meeting the goals advanced by the new ENERGY STAR criteria.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "C.O. Ward", with a long, sweeping horizontal line extending to the right.

Christopher O. Ward