

October 15, 2004

Richard H. Karney, P.E.  
U.S. Department of Energy  
ENERGY STAR® Program Manager  
1000 Independence Avenue SW, EE2J  
Washington, DC 20585

**RE: Comments on Energy Star Clothes Washer Criteria**

Dear Mr. Karney:

Tacoma Water has been engaged in water-efficiency programs since the late 1980's. Conservation of this essential resource is a key element of our long-range water supply strategy. Even though Tacoma's water supply is adequate for the next fifty years, we plan to reduce customer water demand ten percent by 2011. We plan to accomplish this through a variety of incentives and public education measures, such as the rebates for high efficiency washers that we have made available since 1997. As you may know, these machines reduce water use by 15-25 gallons per day per home and up to 9000 gallons per year per home. Our electric utility is interested in the energy savings that these appliances produce as well.

While rebates have been used to encourage customers to choose water efficient washers, customers have had to rely on information from the utility or from appliance retailers to educate them about which washers are water efficient. While the ENERGY STAR® marketing program has differentiated many products in the market place, including clothes washers, the current ENERGY STAR® criteria for washers is providing a disservice to consumers by only differentiating clothes washers that save energy. Consumers who have heard about the water efficiency characteristics of new washers may mistakenly think ENERGY STAR® washers are also water efficient. Since this is not necessarily true, it has added considerable confusion to the market place.

At the DOE Stakeholders' meeting on August 31, 2004, there appeared to be agreement that a water factor (WF) criteria should be added to Energy Star labels. Since many clothes washers are already available that would meet a 7.5 WF and many more will be on the market by 2007, this WF level is being supported by many water utilities and other organizations for implementation in 2007.

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Tacoma Water urges you to accept this recommendation and set a WF of 7.5 for inclusion in Energy Star specifications in 2007. This standard would greatly help Tacoma Water and many other utilities to meet our long-term water needs.

Thank you for the opportunity to submit comments. If you have any questions, please contact Anna Thurston, Water Conservation Specialist at 253-502-8723, or by e-mail at [athursto@cityoftacoma.org](mailto:athursto@cityoftacoma.org).

Sincerely,

John C. Kirner  
Water Superintendent

JCK:nr

cc: Jane Evancho, Water Resource Planning Manager, Tacoma Water  
Anna Thurston, Water Conservation Program Specialist, Tacoma Water  
Steve Hatcher, Energy Services Manager, Tacoma Power