

October 15, 2004

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

via e-mail: [richard.karney@ee.doe.gov](mailto:richard.karney@ee.doe.gov)

Dear Mr. Karney:

Water conservation is an essential element of any long-range water supply strategy. The Water-Wise Council of New York has been working for many years to promote water conservation in the New York metro region. The Council was pleased to learn that the Department of Energy is considering inclusion of a Water Factor in the 2007 Criteria and provide the following comments on the ENERGY STAR Clothes Washer Criteria.

The Water-Wise Council of New York, Inc. (WWCNY) is a non-profit organization comprised of educators, water suppliers, business people, government officials, and citizens whose mission is to promote water conservation/efficiency and sound water use management practices. It is a public/private partnership which serves as forum for the discussion and dissemination of information and materials on water efficiency programs and activities.

Since its formation in 1995 the WWCNY has sponsored a number of water conservation/efficiency programs including Workshops, seminars and the SAVEWATER conferences most recently in 2004. The Council has developed a "Water Savers Guide to Landscaping and Gardening" which is a comprehensive guidebook on water efficient landscaping practices. The Water-Wise Council of New York is also the lead organization in the region for the Groundwater Guardian program assisting local water supply utilities in organizing water resource/supply initiatives and serving as a forum that educates people about the importance of groundwater protection.

One important water conservation component is to reduce indoor use through replacement of inefficient clothes washers with efficient clothes washers. These efficient machines are already available on the market and reduce water use by 15-25 gallons per day per home. This reduces water demand by up to 9000 gallons per year per home.

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To date, customers have had to conduct their own research or rely on information from appliance retailers to educate them about which washers are water efficient. While the ENERGY STAR marketing program has been effective in differentiating 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.

The addition of water factor criteria to the ENERGY STAR program will help consumers immensely in making their decisions. The Council understands that 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. 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.

The Water-Wise Council of New York strongly urges you to accept this recommendation and set a WF of 7.5 for inclusion in ENERGY STAR in 2007. This standard would greatly help the Water Wise Council in its efforts to promote water conservation, educate residents in the New York metro region and assist the region in meeting our long-term water needs.

Thank you for the opportunity to submit comments on this important matter. If you have any questions, please contact Gina D'Agrosa at (914)995-4425 or [gtd1@westchestergov.com](mailto:gtd1@westchestergov.com).

Sincerely,

Gina D'Agrosa  
Water Wise Council

Cc: Executive Committee  
Board of Directors