

Association of Home Appliance Manufacturers (AHAM)

DOE Workshop on Potential Revisions to the Energy Star Criteria for Dishwashers

July 13, 2005

Larry Wethje, AHAM

Introduction

- ◆ AHAM
 - Manufacturers' Trade Association
 - Members represent manufacturers of >90% of dishwashers sold in the U.S.A.
- ◆ Focus of AHAM Comments to DOE
 - Standby Power
 - Water Usage
 - Effective Date

Standby Power

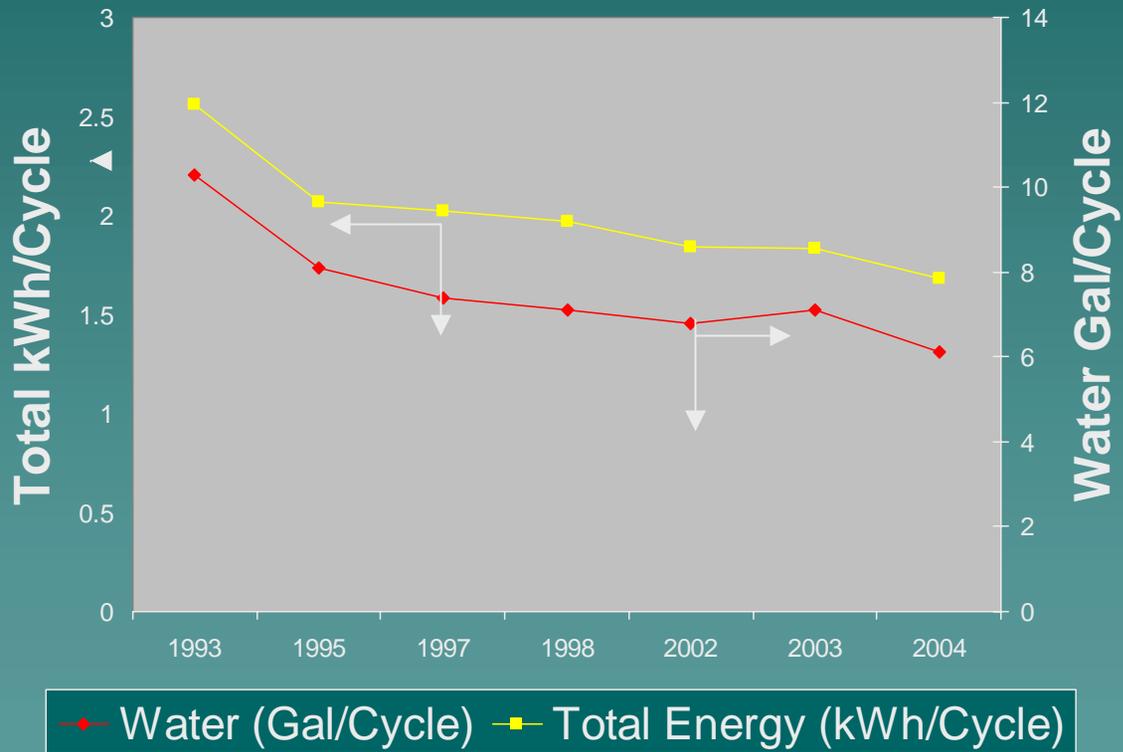
- ◆ Should it be incorporated?
- ◆ Minimal impact: 1 watt < \$1/yr
- ◆ AHAM Recommendations:
 - **IF** it is included, do not set prescriptive limit such as “x” watts for standby power
 - Consider maximum allowable energy usage in kWh/yr, which would include normal energy usage (EF) AND standby power
 - Benefit: give manufacturers more flexibility to innovate and manage energy (e.g., reduce peak loads)

Water Usage

- ◆ AHAM Recommendations:
 - Do not set prescriptive limit on water use; not necessary
 - Higher energy efficiency is directly linked to less water usage (as shown on next slide)
 - Focus on reducing consumer pre-rinsing instead

Dishwasher Energy & Water Trends

(AHAM shipment weighted avg. values)



Effective Date

- ◆ Consider sufficient time so manufacturers can revise complete product lines and strategies
- ◆ Set effective date that is at least 24 months past the date on which the criteria is finalized
- ◆ Energy Star success has made it a critical marketing strategy
- ◆ To maintain its success, adequate lead time is necessary
- ◆ Other DOE regs allow 3 to 5 years lead time

SUMMARY

- ◆ IF standby energy is included, incorporate it in the total annual energy use criteria, not separately
- ◆ No need for prescriptive water requirement
- ◆ Allow 24 months lead time for effective date