Association of Home Appliance Manufacturers (AHAM)

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

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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)

![Graph showing trends in Total kWh/Cycle and Water Gal/Cycle over years from 1993 to 2004. The graph indicates a downward trend in both categories over the years.]

- Red line: Water (Gal/Cycle)
- Green line: Total Energy (kWh/Cycle)
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.
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.