



GE Appliances & Lighting

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November 10, 2010

Via E-Mail

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Program Requirements Product Specification
For Residential Dishwashers, Eligibility Criteria, Draft 1, Version 5.0

Dear Ms. Stevens:

On behalf of GE Appliances (GE), I would like to provide our comments on the ENERGY STAR Program Requirements Product Specification for Residential Dishwashers, Eligibility Criteria, Draft 1, Version 5.0. GE has had a long commitment to energy efficiency, including the manufacture of energy efficient appliances, as evidenced by receipt this year of ENERGY STAR's Sustained Excellence award for the fifth straight year. As such we have a strong commitment to the value of the ENERGY STAR brand, and offer these comments to you in a spirit of partnership.

GE hereby adopts by reference the comments submitted by the Association of Home Appliance Manufacturers (AHAM) and supplements them in the following respects.

EPA's proposal prematurely modifies the qualification criteria for dishwashers, and EPA should retain the previously set increase for 2011 which manufacturers have been planning towards and investing significant program resources in reliance upon, since 2008. In addition to undermining manufacturer's reliance on the criteria previously set for 2011, EPA's proposal runs the risk of undermining the major agreement on federal minimum energy conservation standards for certain products including dishwashers, related test procedures, ENERGY STAR, and financial incentive provisions that GE, along with other manufacturers, recently reached with energy efficiency advocates. The proposed incentives for dishwashers as outlined in this package were designed to encourage super-efficient dishwashers, among other products, at the efficiency levels now proposed by EPA in calendar years 2011-2013.

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Further, EPA recognizes that efficiency levels that are this aggressive must be coupled with performance criteria. However, the introduction of a performance test is premature. EPA should not circumvent DOE's expertise by deciding what test procedure should measure performance, and, necessarily, any performance test must be integrated with the applicable test procedure for the product. We question as well how a performance test would be administered by third party laboratories that currently do not have the experience, or perhaps even the equipment, to effectively administer the test. The AHAM DW-1 test procedure will be refined by the DW-1 task force, with the expectation that this will be completed by 2013, in time for the next change in energy efficiency standards. Given the foregoing, EPA should not propose the qualification levels contained in the present Proposal until this time as well.

Please feel free to contact me at (502) 452-7603 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Kelley Kline". The signature is written in black ink and is positioned above the printed name.

Kelley Kline
Counsel, Regulatory