



GE Consumer & Industrial

Appliance Park, AP2-225
Louisville, KY 40225
USA

September 6, 2005

Richard Karney
Energy Star Program Manager
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Washington, DC 20585-0121

Re: Proposed Revisions to ENERGY STAR® Criteria for Dishwashers

Dear Mr. Karney,

GE submits these comments regarding the Department of Energy's ("DOE" or the "Department") proposed revisions (the "Proposal") to the qualification levels for ENERGY STAR dishwashers. GE appreciates the opportunity to comment on the proposal. GE has been an ENERGY STAR partner since 1997. The Department recognized our commitment to ENERGY STAR by selecting us in 2004 and 2005 as ENERGY STAR Manufacturer of the Year.

I. A significant increase in the ENERGY STAR-qualification level for dishwashers is justified

GE agrees with the Department's conclusion, based on its market analysis that shows that 89% of the dishwashers sold in the U.S. perform at the current .58EF ENERGY STAR level, that an increase in the qualification level is needed. And, since the demonstrated efficiency potential of dishwashers is high,¹ GE believes that the Department's general goal to set a qualification level targeting the top 25% of a product category can be achieved.²

¹ According to the Department's analysis presented at the July 13, 2005 Stakeholders Meeting, 89% of all U.S. dishwashers meet the .58EF level, 36% are at .62, and 18%, .64.

² In this regard, the dishwasher product category differs substantially from that of clothes washers, where the 25% target would exclude value-priced top-load washers. This result would thus fail to achieve DOE's other goals of ensuring that ENERGY STAR-qualified products are available a broad price points and preserve consumer utility and features.

GE's recommended qualification level of .65EF would achieve all of the Department's goals for ENERGY STAR. Such a significant increase would reduce the percentage of qualifying models to approximately 20% without compromising consumer affordability or features.

II. The Department's analysis does not support the need for a prescriptive water criterion in the new dishwasher ENERGY STAR-qualification level

The analysis presented by the Association of Home Appliances Manufacturers ("AHAM") shows the correlation between higher energy efficiency and lower use in dishwashers.³

This is hardly surprising since about 50% of dishwasher energy is used to heat water to the recommended 130°F.⁴ More efficient pumps and innovative spray-arm configurations have enabled manufacturers to reduce water use, and therefore energy use, without sacrificing wash performance.⁵ The Department has not been demonstrated that a prescriptive water use requirement is needed to continue the current trend.

The water inefficiency of hand pre-rinsing, however, has been clearly demonstrated⁶ and efficiency advocates at the July 13, 2005 Stakeholders meeting joined with industry in asking the Department to help educate consumers on the water-saving benefits of not pre-rinsing.⁷ This would be a much more effective use of the Department's resources and one that provide a further opportunity to promote the ENERGY STAR brand than to start a contentious battle over dishwasher water use.

III. GE opposes a separate stand-by power criterion for ENERGY STAR-qualified dishwashers

When GE and other manufacturers introduced electronic controls into their products they did so to improve reliability. They soon discovered that these advanced controls also offered the opportunity to add new consumer features in a way that mechanical controls never could.

A perfect example is the turbidity sensor, which, by detecting soil levels in dishwasher water, can compensate for consumers' uncertainty about cycle settings and optimizes dishwasher performance. The result is a reduction in the number of fill

³ See AHAM's analysis, http://www.energystar.gov/index.cfm?c=revisions.dishwash_spec (AHAM).

⁴ Unless the wash temperatures approach 130°F, fatty soils and greases will not be dissolved and washed away. Testimony of Michael Beyerle, July 13, 2005 Stakeholders meeting, http://www.energystar.gov/index.cfm?c=revisions.dishwash_spec (General Electric).

⁵ Beyerle testimony, *ibid*.

⁶ See analysis, Oregon Department of Energy, <http://egov.oregon.gov/ENERGY/>

⁷ Comments of Ed Osann, Steering Committee for Water Efficient Products.

cycles, and also the energy used when dish-loads are only lightly soiled. The Department ought not to discourage similar innovations by placing unnecessary constraints on the standby power use. The small amount of energy consumed should simply be rolled into the total allowed energy.

IV Conclusion

GE urges DOE to adopt a .65EF ENERGY STAR qualification level for dishwashers effective on January 1, 2006.⁸ All manufacturers have agreed that this level is feasible without degradation of performance. This level also would allow the Department to attain its general goal of targeting the top 25% of a product category for ENERGY STAR.

GE opposes separate water-use and standby energy requirements. Encouraging dishwasher sales and campaigning to discourage hand washing and pre-rinsing can better achieve water-efficiency goals. Given the clear correlation between energy and water use in dishwashers, the most assured way to reduce water would be to increase significantly the ENERGY STAR qualification level to .65EF. And limiting standby energy would more likely discourage innovation, some of which, given the increasing focus at the local levels, will likely focus on electronic controls that improve water efficiency.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Earl F. Jones', is written over a large, loopy scribble that also overlaps the text 'Respectfully submitted,'.

Earl F. Jones
Senior Counsel

CC: Michael McCabe

⁸ A January 2006 effective date was, arguably, mandated by Congress in the Barton-Domenici Energy Policy Act, which pegs tax credits for energy efficient dishwashers—and other appliances, too—to the ENERGY STAR level in effect for the 2006 tax year, which begins in January.