



**Proposed ENERGY STAR®
Criteria for Dishwashers**

Changes in Qualification Levels

- **WHR agrees that levels should be revised.**
- **Current ENERGY STAR levels no longer have the desired marketplace impact.**

Standby Power

- **An increasing number of models utilize standby power to bring a broader set of features and benefits to the consumer.**
- **Such use should be accounted for in ENERGY STAR measures.**
- **The Energy Factor value (EF) is not able to represent standby power. Some products have standby power and some do not. The EF is not readily understood by the customer.**
- **Instead of the EF value, consideration should be given to using the kWh consumed for 215 DW operations combined with the kWh used for annual standby power to indicate total energy consumption in kWh.**
- **kWh is used by the DOE test procedure and is already shown on the FTC EnergyGuide label.**
- **Consumers understand that a lower kWh equates to lower operating cost.**

Water/Energy Correlation

- **Water consumption should not be included as an ENERGY STAR criterion.**
- **Water use in DWs is highly correlated with energy consumption.**
- **Thus, a reduction in energy use results in a correlating reduction in water use.**
- **DW water use is modest---on the order of 1/10th of 1% of total U.S. water use.**

Reaction Time is Needed

- **Manufacturers need sufficient time to react to any new criteria.**
- **A larger improvement in the ENERGY STAR level needs to correspond to a longer lead time between issuance of the final qualification level and the effective implementation date.**
- **Some actions we must take: develop and test new product lines, locate adequate supply base and manufacturing capability, develop merchandising plans, prepare the ENERGY STAR logo for the appropriate products, use and care manuals, and how to locate the label / tag on the product.**

