

March 4, 2011

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 2, Version 5.0

Dear Ms. Stevens:

On behalf of the American Council for an Energy-Efficient Economy (ACEEE) and the undersigned energy efficiency advocacy organizations, this letter provides our comments on the proposed ENERGY STAR Draft 2 Version 5.0 specification for dishwashers. As strong supporters of the ENERGY STAR program, we appreciate the opportunity to provide our comments and perspectives on the draft revisions to the dishwasher program requirements.

These comments supplement the joint comment letter we have submitted with the Association of Home Appliance Manufacturers (AHAM).

Specification Levels and Effective Dates

As outlined in our joint comments with AHAM and our earlier comments on Draft 1 of the Version 5.0 specification, we encourage EPA to maintain the originally planned product criteria and effective date: ≤ 307 kWh per year and ≤ 5.0 gallons of water per cycle effective July 2011. While we appreciate EPA's efforts to address our earlier comments, we believe the Tier 2 requirements established under Version 4.1 of the dishwasher spec should stand rather than setting the precedent that Tier 2 specifications are meaningless and subject to change on short notice. In this instance, we are particularly concerned given that changes to previously announced Tier 2 specification are still under consideration less than 5 months before the original effective date.

The ENERGY STAR dishwasher program has been very successful as evidenced by the rapid response of manufacturers and consumers resulting in high market shares for the Version 4.1 Tier 1 specification. Rather than delaying the introduction of a more stringent revised specification, we propose the following alternative to EPA's proposal:

- V5.0 Tier 1 (equivalent to V4.1 Tier 2): ≤ 307 kWh/year and ≤ 5.0 gallons/cycle (effective July 1, 2011)
- V5.0 Tier 2: ≤ 280 kWh/year and ≤ 4.0 gallons/cycle (effective July 1, 2012)

Our proposal would maintain the integrity of the process for setting Tier 2 specifications and, by moving up the date for the most stringent proposed level, should provide for strong energy and water savings. This would also encourage manufacturers to introduce some of their new highest efficiency machines in advance of the effective date of new standards while providing adequate time to develop and test these products.

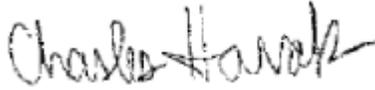
Thank you for the opportunity to provide our feedback. If you have any questions regarding our comments, please contact Jennifer Amann at 202.507.4015 or jamann@aceee.org



Steve Nadel
Executive Director
American Council for an Energy-Efficient Economy



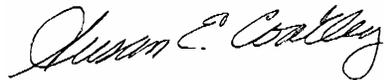
Andrew deLaski
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Appliance Standards Awareness Project



Charles Harak, Esq.
National Consumer Law Center
(On behalf of its low-income clients)



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