

March 4, 2011

Amanda Stevens  
US Environmental Protection Agency  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. Stevens:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR Dishwasher Draft 2 Version 5.0 Specification, released by the Environmental Protection Agency (EPA) on February 3, 2011.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 44 U.S. states and 8 Canadian provinces. In 2010, CEE members directed over \$7.5 billion of energy efficiency program budgets in the two countries. In short, CEE represents the groups that are actively working to make ENERGY STAR the relevant platform for energy efficiency across North America.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We would like to thank EPA for the opportunity to provide comments on this specification revision.

## Advanced Tier Levels

CEE has raised concerns with ENERGY STAR setting tier levels out in the future as part of past comment letters on many ENERGY STAR product categories (e.g. televisions, set-top boxes, and dishwashers) and we believe the same issues apply to this proposal. To avoid leaving savings on the table and maintain relevance in the market, ideally ENERGY STAR would continue to evaluate all specifications frequently and make revisions as dictated by market changes. CEE recognizes

that specifying future ENERGY STAR requirements provides manufacturers with long lead times, reduces the number of specification revision processes, and ensures ENERGY STAR continues to ramp up its performance requirements over time. However, if these scheduled increases fail to reflect future market conditions, CEE members may choose not to promote ENERGY STAR-labeled products. If the strategy of specifying future requirements goes forward, EPA would be well served to explicitly inform stakeholders they reserve the right to amend the future requirements to protect the integrity of ENERGY STAR. ENERGY STAR should include a market review at least 6 months before a scheduled change will go into effect to ensure they will be in line with ENERGY STAR guiding principles. To this point, CEE is pleased to see that ENERGY STAR completed a market assessment of the proposed July 1, 2011 dishwasher levels from version 4.0 of the specification and has decided to update the requirements based on current market conditions.

## Energy and Water Requirements

In our comment letter from November 11, 2010, CEE indicated support for the adherence to the ENERGY STAR guideline that approximately 25% of dishwasher models meet the proposed ENERGY STAR criteria (while also maintaining consistency with the other brand tenets) when the specification becomes effective. Thank you for providing additional analysis that reveals the proposed ENERGY STAR Tier 1 level represents 21% of products in the market. With this assurance, we support the proposed level.

## Cleaning Performance

While CEE acknowledges the general point regarding cleaning performance of dishwashers, we do not have a technical basis to provide specific comments in support of or counter to EPA's proposal. If EPA elects to move forward with the outlined approach, CEE requests that EPA share the cleaning performance data with efficiency programs. We ask that this data be provided on a quarterly basis, as an additional column on the list of ENERGY STAR qualified dishwashers. CEE intends to use this information to assess whether cleaning performance declines with reduced energy and water consumption and ensure that dishwashers being promoted by efficiency programs are meeting consumer cleaning needs (e.g. not requiring consumers to pre-rinse dishes or re-run loads).

Thank you for your consideration of these comments. Please contact CEE Program Manager Eileen Eaton at (617) 337-9263 with any questions.

Sincerely,



Marc Hoffman

Executive Director

## Supporting Organizations

Avista

BC Hydro

City of Seattle

New York State Energy Research and Development Authority

Southwest Gas Corporation

United Illuminating

Western Massachusetts Electric Company