

ENERGY STAR Version 3.0 Limited Topic Proposal Comment Response Document

Topic	Subtopic	Stakeholder Comment	EPA Response
Certification Criteria	Energy Recovery Credit	A stakeholder noted that while there may not be a perfect solution for normalizing heat recovery and non-heat recovery machines, this solution was fair and representative. Another stakeholder stated their support for the revised definition of heat recovery machines and agreed with aligning with the ASTM F1696 and F1920 standards on inlet water temperature.	EPA appreciates these comments regarding the heat recovery machine definition and hot water energy offset calculation proposal.
	Water Consumption	A stakeholder noted that drain water tempering devices are typically built into commercial dishwasher products since local ordinances require tempering. They recommended that the water consumption by a drain water tempering device used to achieve an outlet temperature of 140 °F is added to the Qualified Product List. They stated that this would support future conservation efforts and enable consumers to select both energy and water efficient equipment.	EPA acknowledges that codes in some locales require cooling of equipment effluent such not to exceed 140°F. The tempering of drain water can account for significant additional, potable water consumption for some types of commercial kitchen equipment, including commercial dishwashers. Though not enforced in every locale, EPA recognizes the potentially significant increase in overall water consumption. Per ASTM F1696-18 Section 9.8, a separate water meter shall be installed for any cold water connections; however, the test method does not specify when the recording of the water tempering supply begins/ends and at which point during the test procedure. Additionally, there is no indicator as to how the water tempering volume shall be expressed (i.e., GPH, GPR, etc.). EPA will track this discussion at the ASTM committee and will consider adding water tempering as a reporting requirement during the next revision.
	Wash Energy	One stakeholder commended EPA for including the reporting of the washing energy performance on the Qualified Product List, noting that washing performance is valuable information for end users, program implementers, advocacy organizations, and regulators.	EPA appreciates the supportive comment from this stakeholder.