



May 18, 2020
Via Electronic Mail

U.S. Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, D.C. 20460
Appliances@energystar.gov

Subject: ENERGY STAR® Residential Dishwashers Version 7.0 Draft 1 Specification

Dear Ms. Park,

This letter is submitted on behalf of the Northwest Energy Efficiency Alliance (NEEA) in response to the request for comments on the Draft 1 Version 7.0 Residential Dishwasher Specification. NEEA is a non-profit organization representing an alliance of more than 140 Northwest utilities and energy efficiency organizations working on behalf of more than 13 million energy consumers. We encourage the development and adoption of criteria recognizing energy and water-efficient products that help consumers save on utility bills.

We strongly support the U.S. Environmental Protection Agency's (EPA) ENERGY STAR® program. ENERGY STAR is a critically important federal program created with bi-partisan support that annually delivers billions of dollars of energy savings to consumers and businesses. As such, ENERGY STAR's leadership in setting appropriate product specifications plays a critical role in advancing the efficiency of consumer products that meet experiential expectations and save consumers energy and money.

NEEA is pleased to see that EPA has proposed an update to the dishwasher's specification. As EPA stated in the specification cover memo, ENERGY STAR-qualifying dishwasher products occupy 90 percent of the total market share. Web scraping data collection and analysis funded by NEEA and shared with EPA found a similar market share when weighting by review count. We believe it is an appropriate time to implement more robust requirements for products to be recognized as ENERGY STAR, and NEEA supports EPA's draft proposal. EPA determined that approximately 15 percent of residential dishwashers qualify for the updated specification and that 28 percent qualify with when using a 5 percent engineering factor. We believe this is an appropriate benchmark for distinguishing high-efficiency products. We are pleased to see that EPA is updating the ENERGY STAR criteria to continue to only recognize products with advancements in energy and water efficiency.

NEEA supports EPA's decision to align the version 7.0 specification level with the 2020 ENERGY STAR Most Efficient (ESME) specification for residential dishwashers. Stakeholders should anticipate that ESME specifications will be the basis of future updates and that there is significant value in pursuing higher efficiency. This specification development process is an excellent example of giving market actors a clear path for efficiency recognition.

NEEA supports EPA's decision to only consider products that meet a minimum cleaning performance score. This decision is important to ensure that high-efficiency products perform their function as well or better than products that meet the federal minimum efficiency standards and continue to provide customer satisfaction. NEEA is pleased to see that EPA conducted additional analysis on the washing performance of models that meet the proposed requirement and that all models were rated as "Very Good" or "Excellent". The additional analysis found an average noise performance of "Very Good" for models that meet the proposed efficiency requirements, which is supported by the data collection and analysis NEEA shared with EPA.

Given that in both EPA's additional analysis and the web scraping analysis shared by NEEA ESME products feature high washing performance ratings, quiet operation, and are found to be well-reviewed by consumers, as well as the modest incremental cost found by the EPA, increasing the stringency of the ENERGY STAR specification to align with the ESME 2020 specification could quickly increase the market share of these high-efficiency products and incentivize more manufacturers to make and market dishwashers that meet the specifications.

NEEA is pleased to see that EPA continues to evaluate and revise connected criteria for residential dishwashers. We support including a reporting field to note if a product is network connected. Knowing how many products have connected functionality will help future determinations of the savings potential for demand response programs. Products with open access and energy consumption reporting have the potential to play a significant role in Smart Home Energy Management Systems as well as contribute to grid flexibility in the future.

We thank EPA for revising the criteria for this product category and publishing it for stakeholder input. We support the direction of this specification and look forward to future publication.

Sincerely,



Eric Olson
Sr. Product Manager
Northwest Energy Efficiency Alliance