



1111 19th Street NW > Suite 402 > Washington, DC 20036
t 202.872.5955 f 202.872.9354 www.aham.org

January 14, 2015

Via E-Mail

Melissa Fiffer
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Version 6.0 Dishwasher Specification – Demand Response Criteria
Proposal from EPA

Dear Ms. Fiffer:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Version 6.0 Dishwasher Specification – Demand Response Criteria Proposal from EPA published on December 19, 2014.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports the Environmental Protection Agency (EPA) and DOE in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement, as long as product performance can be maintained for the consumer. Therefore, AHAM supports the new EPA proposal to simplify the methodology for the Temporary Appliance Load Reduction (TALR) and the specified exemption for the sanitization cycle.

Amending Temporary Appliance Load Reduction

In previous specifications, TALR capability is required at least a 50 percent reduction in power draw over the duration of the response, relative to a baseline power draw. EPA and DOE propose what they believe to be a simpler approach that requires a dishwasher, similar to the clothes washer proposal, to reduce its average power draw to no more than a specified, fixed

level (in watts) during the load reduction period which will offer greater test repeatability as well as reduce test burden. AHAM agrees using a fixed level instead of a percentage from a baseline is a simpler approach. We also agree that it will offer greater test repeatability while also reducing burden during product development and testing.

EPA proposed that the TALR capability require, at a minimum, the dishwasher to restrict its average power draw during the load reduction period to no more than 250 watts. The proposed 250 watt level was based in part on test data DOE collected on three ENERGY STAR dishwasher models. AHAM agrees with EPA's assessment that at this level, a dishwasher may need to discontinue operations such as water heating and power dry, but continue operations such as circulating water, soil sensing and soil sensor calibration. Therefore, AHAM agrees with the removal of the 60 second delay during TALR.

AHAM appreciates the opportunity to submit comments on ENERGY STAR Version 6.0 Dishwasher Specification Demand Response Criteria Proposal and is glad to answer any questions from EPA.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Charlotte Skidmore', is positioned above the printed name.

Charlotte Skidmore
Director, Energy & Environmental Policy

