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April 13, 2015

Via E-Mail

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

Re: ENERGY STAR Program Requirements: Product Specification
for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 6.0

Dear Ms. Fiffer:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 6.0.

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 EPA and the Department of Energy (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. We appreciate that EPA removed the performance reporting requirement that it initially proposed in Draft 1. We continue to have concerns about the value of the data EPA will receive based on its voluntary collection effort.

I. Reporting Requirement for Cleaning Performance

In Draft 1, EPA proposed a reporting requirement for cleaning performance. In Draft 2 and in the Final Draft, EPA proposed voluntary performance score reporting in lieu of the previously proposed required performance score reporting. Because AHAM opposed the performance reporting requirement, we are glad EPA does not plan to make the reporting requirement mandatory. Although a voluntary reporting option is far preferable to a reporting requirement, AHAM remains concerned that the data EPA receives will be of questionable value.

As we previously commented, the utility of data collected using the existing ENERGY STAR test method for determining residential dishwasher cleaning performance will be questionable given the level of variation our round robin testing demonstrated. The scoring results, using the AHAM scoring method, from the round robin AHAM conducted showed a range of two standard deviations (99.5 to 71.4 for the soil sensing unit tested and 94.8 to 83.4 for the non-soil sensing unit tested). It will be difficult to accurately or confidently compare data across manufacturers given the concerns we have raised about reproducibility. It would be preferable for the test procedure to first be tightened before engaging in even voluntary data collection. We understand that the timeline for improving the test procedure would likely be too long to allow for the collection of data in time for a possible next specification revision. Nevertheless, we believe that prior to data collection of any kind, test procedure revision to improve repeatability and reproducibility should at least be considered. In addition, the nature of a voluntary data collection process is that it could be self-selecting.

AHAM is also concerned that EPA still has provided no detail on how it plans to use or analyze the data. EPA simply stated that “the data collected will inform the specification development process.” But it is unclear whether EPA plans to use the data to determine whether the next proposed dishwasher ENERGY STAR specification level will negatively impact performance or whether EPA plans to use the data to set a performance metric. We would like to better understand why EPA seeks to collect performance data on the model level and what, exactly, EPA intends to do with the data it receives. As discussed below, AHAM would oppose use of this data to set a performance metric in a future dishwasher specification.

Because of these flaws, AHAM continues to believe that it is important that experts, i.e., manufacturers, review and analyze the data in order to decide if it is relevant to determine the connection between energy/water use and performance. Accordingly, AHAM again suggests that EPA expressly permit data to be submitted by AHAM after being aggregated and de-identified. EPA failed to even acknowledge this suggestion in its response to comments on Draft 2, let alone respond to it. We note that we would not envision providing this data on an ongoing basis, but rather, if relevant, during a possible next specification revision process. We believe that it is likely that AHAM could obtain more complete data than EPA may receive.

Despite AHAM’s opposition to performance criteria in specifications, we wish to be clear that AHAM agrees that EPA should evaluate whether performance will be negatively impacted by any specification levels it proposes. It is important for performance to be maintained as efficiency requirements become more stringent. Although EPA has not proposed to do so in this draft, we reiterate that EPA should not include performance metrics in potential future

specifications. Manufacturers themselves have the most interest in ensuring that consumers receive superior performance, regardless of the energy and water efficiency of the product. It should not be the role of government, particularly in a voluntary program authorized to set energy efficiency criteria, to set performance requirements.

II. Connected Criteria

EPA and DOE propose what they believe to be a simpler demand response TALR 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.

AHAM also 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. AHAM, therefore, agrees with the removal of the 60 second delay during TALR.

III. Correction

AHAM notes that there appears to be a typo in Section 6. The Final Draft references 10 C.F.R. Part 429, Subpart B, 429.16. That section is for central air conditioners and heat pumps. The correct citation is to section 429.19 for dishwashers.

AHAM appreciates the opportunity to submit comments on the ENERGY STAR Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 6.0 and would be glad to further discuss these matters should you so request.

Best Regards,



Jennifer Cleary
Director, Regulatory Affairs