

Appliance Standards Awareness Project

June 30, 2022

Ga-Young Park
Product Manager for Appliances
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Residential Dishwasher Version 7.0 Final Draft Specification

Dear Ms. Park,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the Residential Dishwasher Version 7.0 Final Draft Specification released on June 2, 2022. We appreciate the opportunity to comment.

We support the minimum energy and water efficiency requirements in the Final Draft specification.

Revised efficiency criteria will be critical to ensuring market differentiation for ENERGY STAR certified dishwashers. EPA estimates that if all dishwashers met the proposed Version 7.0 criteria, annual CO₂ emissions reductions would reach more than 10 billion pounds and annual water savings would reach more than 60 billion gallons.¹ Furthermore, based on actual prices of dishwashers in the market as of May 2022, EPA found that the incremental cost of select models meeting the proposed Version 7.0 specification relative to models just meeting the minimum DOE standards would be paid back in less than 2 years.²

We continue to support the inclusion of a cleaning performance requirement. EPA's proposal to require that dishwashers meet a minimum cleaning index will ensure that only dishwashers that provide adequate cleaning performance will be able to be certified to the ENERGY STAR specification. This will also align the ENERGY STAR test requirements with the cleaning performance test method in the proposed DOE test procedure.³

Thank you for considering these comments.

Sincerely,



Kanchan Swaroop
Technical Advocacy Associate
Appliance Standards Awareness Project

¹ ENERGY STAR Final Draft Version 7.0 Residential Dishwasher Data & Analysis Package.
<https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Final%20Draft%20Version%207.0%20Residential%20Dishwasher%20Data%20%26%20Analysis%20Package.xlsx>

² Ibid.

³ <https://www.regulations.gov/document/EERE-2016-BT-TP-0012-0013>.