

**Summary and Response to Stakeholder Comments Received on the ENERGY STAR Draft 2 Version 6.0 Residential Dishwasher specification**

Topic	Comments	EPA Response
Energy and Water Criteria	<p>One stakeholder does not believe that additional insulation is a viable option for compact dishwasher manufacturers to achieve improved efficiency.</p>	<p>As EPA noted in Draft 2, the Agency consulted the DOE TSD and manufacturers to gain further understanding of what technology options were feasible for increasing the efficiency of compact dishwashers. Although the TSD did not specify additional insulation as an option for higher efficiency levels, manufacturers identified this as a potential approach. The intent of the technology options list was to demonstrate that multiple pathways exist for manufacturers to meet the proposed compact dishwasher criteria levels.</p>
Cleaning Performance	<p>One commenter noted that although cleaning performance data collection is, in theory, supported to inform the ENERGY STAR specification development process, it is premature to consider even voluntary data collection due to concerns with the test method and of the use and confidentiality of any data supplied by manufacturers.</p> <p>EPA is urged to consider allowing AHAM to collect, aggregate, and de-identify the data and report it as appropriate during the specification development process.</p>	<p>As EPA noted in Draft 2, cleaning performance data will allow test labs to gain more familiarity with the ENERGY STAR Cleaning Performance Test Method, and help EPA identify the impact of higher efficiency levels on performance. In this Final Draft, EPA is clarifying that the data collected will inform the specification development process, and will not be made public to consumers or third parties.</p> <p>As for how to submit cleaning performance data, brand owners should work with their EPA-recognized certification body to submit at the time of certification. Brand owners may instead choose to submit the data, along with model information on energy and water use, directly to ENERGY STAR via <a href="mailto:appliances@energystar.gov">appliances@energystar.gov</a>.</p>

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Cleaning Performance	One stakeholder emphasized the importance of cleaning performance and recommends that EPA move toward a mandatory reporting requirement of cleanability test results.	In lieu of a mandatory reporting requirement, EPA is strongly encouraging manufacturers to submit cleaning performance data. EPA views voluntary reporting as a means to learn more about the relationship between cleaning performance and efficiency, and inform the next specification revision.
Connected	One stakeholder noted that the five percent energy credit is supported. However, EPA is urged to require the use of multiple pathways of connection to qualify for the credit.	<p>EPA has retained the five percent allowance in the Final Draft for ENERGY STAR standard dishwashers with connected functionality, to help drive near-term, consumer value through the availability of new energy savings and convenience features. This functionality may also provide future benefits to the electric grid and additional consumer savings once the supporting infrastructure is built. This temporary incentive is designed to help 'jump start' the market.</p> <p>While open-standards and open-access continue to be mandated, in the interest of limiting incremental product costs, EPA does not require multiple interconnection pathways to qualify for the credit.</p>