

Ref No	Topic	Comment	Response
1	Connected	<p>One stakeholder noted that EPA has proposed a simpler TALR response criteria for clothes washers to reduce average power draw no more than a fixed, specified wattage level over the response period. While this approach offers both increased testing repeatability and reduced burden, EPA did not propose the same language for dishwashers in Draft 2. This stakeholder has inquired as to whether EPA intends to propose this simpler approach for dishwashers.</p>	<p>While the dishwasher Draft 2 TALR proposal was informed by the January 2011 (Smart Appliances) joint petition to ENERGY STAR, EPA agrees with stakeholders that redefining TALR response criterion, such that the dishwasher must restrict its average power draw over the load reduction period to no more than a specified wattage will simplify implementation, reduce test burden, and improve testing repeatability. As such, in a supplemental dishwasher proposal, limited to Demand Response, EPA has proposed TALR response criterion that requires dishwashers to not exceed a 250 watt average power draw over the duration of the TALR response period. The 250 watt level was informed by DOE test data, included with the supplemental proposal.</p>
2	Connected	<p>One stakeholder noted that EPA proposed that upon receipt of a signal requesting a TALR response, except as allowed in 5.G.2.b for sanitization cycles, the product will respond within 60 seconds of the requested start time. EPA further proposed in Section 5.G.2.d that the consumer would be able to override the product's TALR response before or during the load reduction period. This stakeholder interprets this criteria to be inconsistent and is unclear as to how a consumer would be able to override a response before the load reduction period.</p>	<p>While EPA expects TALR signals to typically request immediate start times, EPA understands that TALR events may be scheduled. In specifying that consumers be able to override a TALR response before or during the response, EPA wishes to ensure DR events may be overridden after they are scheduled, regardless of whether the product has initiated its response.</p> <p>In the supplemental dishwasher proposal, EPA has proposed removal of the 5.G.2.c criterion, that permitted a TALR response delay of up to 60 seconds. This change was informed by DOE data that indicates soil sensing operations need not be interrupted in order to comply with a 250 watt average power draw TALR response limit.</p>