



10200 David Taylor Drive
Charlotte, NC 28262
Telephone 980.236.2000
Fax 704.547.7053

Andrew Stienecker
Sr. Associate General Counsel
(704)773-6459
Andrew.Stienecker@Electrolux.com

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Via email to appliances@energystar.gov

Ms. Ga-Young Park
Product Manager for Appliances
ENERGY STAR Labeled Products
US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC, 20004

Re: ENERGY STAR Residential Dishwasher Version 7.0 Final Draft Specification

Dear Ms. Park,

These comments are respectfully submitted to the Environmental Protection Agency (EPA) on behalf of Electrolux Home Products, Inc "Electrolux" regarding the ENERGY STAR Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 7.0.

Electrolux is one of the world's leading home appliance manufacturers. In the United States, we have three manufacturing plants, three research and development centers, and eleven distribution centers that together employ more than 8,000 full-time workers. We manufacture and sell a full range of home appliance products under the Electrolux and Frigidaire brands. We have been manufacturing dishwashers in Kinston, North Carolina for over 30 years and employ approximately 600 people in that facility.

Electrolux continues to support the EPA's proposed Version 7.0 specification. Based on the current level of penetration of ENERGY STAR qualified dishwashers in the marketplace, Electrolux agrees that it is appropriate to revise energy and water efficiency requirements.

Electrolux is confident that the proposed Version 7.0 can be achieved without adversely impacting performance and without significantly increasing costs to consumers.

We appreciate that the EPA extended the effective date for Version 7.0 to July 6, 2023, in recognition of the continued global supply chain issues that manufacturers face and the impact that has on validation testing.

As stated in our previous comments, Electrolux is not opposed to the use of a cleaning standard or index that demonstrates the performance of dishwashers. We believe that an indication of how a dishwasher washes and dries is important information for consumers.

However, we feel like the current per-cycle cleaning index referenced in the Department of Energy's Notice of Proposed Rulemaking (NOPR) for the test procedure for dishwashers (86 FR 72738) published on December 22, 2021, is not based on sufficient technical detail. More work needs to be done to ensure the test is repeatable and reproducible, and, that the score is helpful and meaningful to consumers. Electrolux stands ready to work with the EPA and other stakeholders on this issue.

Electrolux agrees with the Association of Home Appliance Manufacturers that more needs to be done to promote ownership of dishwashers in U.S. homes and to educate consumers to avoid pre-rinsing and handwashing. Such efforts will clearly help save water and energy and we believe this can and should be done in conjunction with moving to Version 7.0.

Electrolux appreciates the opportunity to submit these comments on the Energy Star Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 7.0, and we would be glad to discuss with EPA further if requested.

Sincerely,

A handwritten signature in black ink, appearing to read 'ASL', written in a cursive style.

Andrew Stienecker

CC: John Mcalister