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Feb. 24, 2022

Ms. Ga Young Park
Product Manager for Appliances
Energy Star Labeled Products
US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC 20004

Sent by email to appliances@energystar.gov

**Re: Energy Star Residential Dishwasher Version 7.0 Draft 2 Specification
Public Version**

Dear Ms. Park:

These comments are respectfully submitted to the Environmental Protection Agency (EPA) on behalf of Electrolux Home Products, Inc. (Electrolux) on the Agency's proposed Residential Dishwasher Version 7.0 Draft 2 Specification.

Electrolux supports the EPA's proposed Energy Star Residential Dishwasher Version 7.0 Draft 2 Specification and it is our intent to have products that will meet the specification. For multiple reasons, Electrolux strongly encourages a delay in the effective date until at least **April 30, 2023**, to ensure that Electrolux has product available for consumers who choose Energy Star.

Electrolux is one of the world's leading home appliance manufacturers. In the United States, it has four 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.

Electrolux has been manufacturing dishwashers in Kinston, North Carolina for over 30 years and employs approximately 600 people in that facility. Electrolux is a longtime supporter of the Energy Star program. Currently all of our dishwashers, except for one model, are Energy Star 6.0 rated.

I. Proposed Effective Date

Considering the global supply chain issues that all manufacturers continue to face, Electrolux strongly encourages the EPA to extend the effective date for Version 7.0 until at least April 30, 2023. The lead time to get component parts for existing products continues to be significantly

longer than normal. Electrolux does not expect supply chain improvement until the second half of 2022.

Another critical consideration is the need for new component validation. New components required to meet Version 7.0 suffer from supply chain delay as well as the need for validation testing making the lead time even longer. This is particularly true for critical components like new cycle software.

The impacts of COVID and supply chain delays are also impacting our internal lab testing volume making it more difficult to schedule lab time and to do the necessary validation testing to ensure that our products will qualify for the new Energy Star standard.

II. Cleaning Performance Metric

Electrolux is not opposed to the development of a meaningful measure or score of the performance of Energy Star rated dishwashers. We believe that an indication of how a dishwasher washes and dries is important to consumers. However, it is critical that any such measure have a clear, scientific basis and that the score is meaningful to consumers.

At this time, we do not think that the basis for the 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 clear or that consumers will know how to interpret the proposed score of 65. We encourage the EPA and the DOE to take the time to develop a performance measure based on data, consumer need and experience, and Electrolux is willing to collaborate with EPA in that effort.

In summary Electrolux supports the EPA's proposed Energy Star Residential Dishwasher Version 7.0 Draft 2 Specification and it is our intent to have products that will meet the specification. However, we strongly encourage a delay in the effective date until at least April 30, 2023, to ensure that there is a smooth transition in the marketplace for consumers.

Sincerely,

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

Andrew Stienecker