

March 26, 2012

Ms. Ashley Armstrong  
U.S. Department of Energy  
Building Technologies Program  
1000 Independence Avenue, SW  
Washington, DC 20585-0121  
Via: [appliances@energystar.gov](mailto:appliances@energystar.gov)

**Re: Comments on Draft 1, ENERGY STAR Test Method for Determining Residential Dishwasher Cleaning Performance, Rev. Feb-2012**

### **Introduction**

Consumers Union<sup>1</sup> (“CU”) submits the following comments in response to the U.S. Department of Energy (“DOE” or “Department”) in the above-referenced matter.

### **Comments**

CU supports the idea of establishing a cleaning performance test method as part of the Energy Star qualification program. While we believe that energy efficiency is an important parameter for appliances, it should not lead to an unacceptable level of performance for that appliance. The proposed draft test method helps prevent that from happening and is a step in the right direction.

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<sup>1</sup> Consumers Union is the public policy and advocacy division of Consumer Reports. Consumers Union works for telecommunications reform, health reform, food and product safety, financial reform, and other consumer issues. Consumer Reports is the world’s largest independent product-testing organization. Using its more than 50 labs, auto test center, and survey research center, the nonprofit rates thousands of products and services annually. Founded in 1936, Consumer Reports has over 8 million subscribers to its magazine, website, and other publications.

However, we also believe that the proposed test method, which duplicates the DOE methodology of soiling dishes, is not ideal. Our position over the years has been that using only ½, 2 and 4 soiled place settings is insufficient when determining a dishwasher's energy consumption. While using three levels of soiled place settings is important in establishing a particular dishwasher's energy consumption profile, setting the largest level at only 4 soiled settings may not always be sufficient to trigger that unit's maximum response. We recommend that all three levels of soil should be increased to 2, 4, and 10 soiled place settings, respectively, but at the very least, the top-most soil level should be greater. Ten soiled place settings should guarantee the maximum response from any machine. We note that Whirlpool's response to this proposal, dated October 19, 2011, put forth a similar recommendation for a future consideration of 8 soiled place settings. This would be a significant improvement over the current method and one we would also support.

Some manufacturers may argue that an increase in soiled place settings would put an undue burden on a dishwasher with regards to its performance. Our experience over many years of testing with very heavily soiled loads have shown that most dishwashers are able to perform at a high level, and have continued to do so while energy efficiency standards have tightened. We believe that manufacturers will be able to handle this challenge to the benefit of consumers.

We appreciate the opportunity to submit our comments and would be glad to discuss this further.

Respectfully Submitted,

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