

1/26/2011

Comments from Daniel Eber of American Dish Service on:

Energy Star Program Requirements
Product Specifications for Commercial Dishwashers

Eligibility Criteria Draft 1: version 2.0

RE: Draft 1: Version 2.0 Section 3) Qualification Criteria
A. Energy and Water Efficiency Requirements

We believe that lowering the water consumption requirements for commercial dishwashers will drop these machines below the threshold of a machine that will function in real life situations. These new requirements will cause increased public beliefs that Energy Star stands for products that don't work. The reduction of water consumption will increase the use of energy. Example: Longer time cycles, addition or increased size of heaters, increased temperature of incoming water, double washing. All of these examples will increase the use of energy in an attempt to lower the use of water.

Thank you for the opportunity to comment on Draft 1: Version 2.0 and I look forward to further discussions on this topic at your meeting on February 10, 2011.

*Thank You,
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