

## Comments on ENERGY STAR Program Requirements for Commercial Dishwashers

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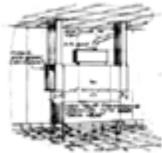
We are glad to see that EPA is considering including flight machines in the standard as with their size and capacity, the opportunity to save energy is greater than any other model currently in the standard. Gallons per 100 dishes is a fair way to compare units and removes the variable such as length , width, speed and peg spacing.

We would suggest separating the category similar to the Rack Type into Single tank and Multiple tank units, this would also be consistent with how NSF evaluates the units.

We do not believe it is necessary to use a standard peg spacing as the peg spacing is used in the dishes per hour calculation so the variable would be addressed there. The spacing of the peg is also a direct result of the units wash and rinse system design, and each manufacturer and unit will have its own unique characteristics determining this.

We do agree that the lowest conveyor speed should be used in the calculation.

Thank you



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