

November 10, 2010

Amanda Stevens  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

RE: ENERGY STAR Program Requirements Product Specification  
For Residential Dishwashers, Eligibility Criteria, Draft 1, Version 5.0

Dear Ms. Stevens:

On behalf of the American Council for an Energy-Efficient Economy (ACEEE) and the undersigned energy efficiency advocacy organizations, this letter provides our comments on the proposed ENERGY STAR Draft 1 Version 5.0 specification for dishwashers. As strong supporters of the ENERGY STAR program, we appreciate the opportunity to provide our comments and perspectives on the draft revisions to the dishwasher program requirements.

These comments supplement the joint comment letter we have submitted with the Association of Home Appliance Manufacturers (AHAM).

#### **Specification Levels and Effective Dates**

As outlined in our joint comments with AHAM, our organizations recently negotiated a consensus agreement on new federal minimum efficiency standards for a set of appliances, including dishwashers. As part of the agreement, we also developed a proposal to extend federal manufacturer tax incentives for products meeting a revised set of more stringent performance requirements for both energy and water efficiency.

The previously announced ENERGY STAR criteria for dishwashers—<307 kWh/year and <5.0 gallons/cycle—announced in 2008 and set to take effect in July 2011 served as the basis for our agreement on federal minimum efficiency standards. The final agreement presented to DOE would establish minimum standards at this level effective January 1, 2013. The proposed ENERGY STAR criteria in the Draft 1 Version 5 specification—<280 kWh/year and <4.0 gallons/cycle—correspond to the most stringent tax incentive levels designed to encourage manufacturers to accelerate introduction of these models into the market in advance of the 2013 effective date for new standards.

In light of our consensus agreement, we encourage EPA to maintain the originally planned product criteria and effective date, and to set a future ENERGY STAR specification at the levels in the Draft 1 Version 5.0 proposal with an effective date of January 1, 2013. The July 1, 2011 specification is the basis for the January 1, 2013 minimum efficiency standard we negotiated with manufacturers. Having this as the ENERGY STAR level prior to the effective date of the standard helps manufacturers to prepare for the new standard, as they can sell many products at this level using the ENERGY STAR label. Also, manufacturers have been preparing for this new level and changing the specification at this late date is disruptive to manufacturers.

Furthermore, we believe that December 2011 is too soon for the Draft 1 Version 5.0 standard to take effect. Manufacturers will need time to develop and test these products. In particular, it will not be useful if they

rush products to market that do not perform adequately. Providing extra time will make well-performing products more likely. Also, with the new minimum efficiency standard likely to take effect January 1, 2013, ENERGY STAR will need to be changed effective this date. We believe that the Draft 1 Version 5.0 standard would be a good 2013 specification and therefore recommend that this date be chosen. By setting the level now, manufacturers will have plenty of time to prepare. Also, this is the same level as is being recommended for federal tax incentives, which could further aid manufacturers to develop and market products at this level.

**Cleaning Performance**

We support EPA's decision to include a cleaning performance requirement in the ENERGY STAR dishwasher specification. While we do not have a specific recommendation for which test(s) should be required, we would encourage EPA to require any accepted test to use highly-rated, commercially available detergents (i.e., non-phosphate detergents available to typical consumers). Detergent requirements will ensure that cleaning performance is consistent with consumer experience in the field.

Thank you for the opportunity to provide our feedback. If you have any questions regarding our comments, please contact Jennifer Amann at 202.507.4015 or jamann@aceee.org



Steve Nadel  
Executive Director  
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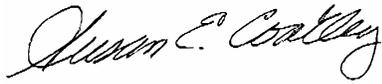
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