October 4, 2010

Dear ENERGY STAR® Residential Dishwasher Manufacturer and Other Interested Parties:

The purpose of this letter is to formally announce that the U.S. Environmental Protection Agency (EPA) is revising the ENERGY STAR residential dishwasher specification. EPA welcomes stakeholder input on the attached Draft 1 Version 5.0 ENERGY STAR Product Specification for Residential Dishwashers. This document outlines the new, proposed requirements that dishwashers will need to meet in order to earn the ENERGY STAR.

The existing ENERGY STAR specification for dishwashers, which was finalized on November 14, 2008, set forth new criteria effective August 11, 2009 and July 1, 2011. In finalizing this 2008 specification, DOE signaled the government's intention to revisit the July 2011 criteria if anticipated qualifying rates warranted more stringent requirements. EPA anticipates more than 50% of standard dishwashers sold next year will meet the 2011 requirement.

Expected ENERGY STAR dishwasher market share, combined with the likelihood of more stringent Federal standards for dishwashers in 2013, suggest a more stringent requirement for standard dishwashers will more effectively designate top performing models, enhancing ENERGY STAR's value to consumers. As part of this revision, EPA is not proposing any additional changes to the levels for compact dishwashers. This new specification, Version 5.0, will replace the 2008 specification and become effective sometime in fall, 2011.

Market research indicates that an opportunity exists for additional, cost-effective energy and water savings as well as greenhouse gas reductions from this product category. Draft 1 Version 5.0 incorporates the following key elements:

- **New Energy- and Water- Requirements for Standard Dishwashers**
  - $\leq 280 \text{ kWh/yr}$
  - $\leq 4.0 \text{ gal/cycle}$

- **Energy- and Water- Requirements for Compact Dishwashers**
  - $\leq 222 \text{ kWh/yr}$
  - $\leq 3.5 \text{ gal/cycle}$

- **Proposed Addition of Cleaning Performance Test & Requirement**
  EPA plans to incorporate a cleaning performance test and metric into this specification to address stakeholder concerns that more stringent efficiency requirements could adversely impact dishwasher cleaning performance. EPA is aware of several existing

---

1 These levels harmonize with one of the performance levels that industry stakeholders and energy and water efficiency advocates have proposed be eligible for manufacturer tax credits.

2 These energy- and water-requirements for compact dishwashers are identical to the ones that were set in the 2008 specification and scheduled to go into effect July 1, 2011.
dishwasher cleaning and sanitation tests. EPA invites stakeholder comment on these existing text methods and on a series of questions included in the draft specification document that address cleaning performance test methods and metrics.

More details regarding EPA’s rationale for proposing these changes are included in note boxes throughout the draft specification document.

**Enhanced Testing and Verification (ET&V)**

On September 14, 2010, EPA released a draft of the existing specification that focuses on clarification of existing testing and qualification requirements. EPA also included revised Partner Commitments that will support the new ET&V requirements. These documents can be found at: [www.energystar.gov/testingandverification](http://www.energystar.gov/testingandverification). The attached Draft 1 Version 5.0 specification incorporates these proposed clarifications to testing and qualification requirements.

**Comment Submittal**

Stakeholders are encouraged to provide written comments for EPA consideration to [appliances@energystar.gov](mailto:appliances@energystar.gov) by November 3, 2010. EPA also welcomes comments on considerations not discussed in the text boxes. All comments will be posted to the ENERGY STAR Product Development website unless the submitter requests otherwise.

**Stakeholder Meeting to Discuss Draft 1**

EPA intends to host an in-person stakeholder meeting in Washington, DC on October 26, 2010 to discuss the Draft 1 specification and address stakeholder questions. A conference call line will be provided to those who cannot attend in person. Stakeholders are encouraged to inform EPA of any industry events that may conflict with this proposed date. EPA will distribute further information about this meeting over the next two weeks.

**Revision Schedule**

EPA’s anticipated schedule for the residential dishwasher specification revision is as follows:

<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 26, 2010</td>
<td>Stakeholder meeting on Draft 1 specification</td>
</tr>
<tr>
<td>November 3, 2010</td>
<td>Comment period closes on Draft 1 specification</td>
</tr>
<tr>
<td>November 2010</td>
<td>Draft 2 specification proposed, stakeholder webinar or meeting, and comment period.</td>
</tr>
<tr>
<td>Early 2011</td>
<td>Final Draft specification proposed, stakeholder webinar or meeting, and comment period.</td>
</tr>
<tr>
<td>February 28, 2011</td>
<td>Final specification posted</td>
</tr>
<tr>
<td>Fall 2011</td>
<td>Final specification effective</td>
</tr>
</tbody>
</table>

*EPA may propose additional draft specifications before issuing a Final Draft.*

To track EPA’s progress in revising the ENERGY STAR dishwasher specification, visit the ENERGY STAR Product Development website at [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs) and click on “Dishwashers”.

Please direct any specific questions to Amanda Stevens at EPA, [stevens.amanda@epa.gov](mailto:stevens.amanda@epa.gov) or 202-343-9106 or Ryan Fogle, D&R International, at [rfogle@drintl.com](mailto:rfogle@drintl.com) or 301-588-9387. Thank you for taking the time to review this draft specification. I look forward to working with you over the next few months.

Sincerely,

Amanda Stevens  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program