

March 31, 2014

To: Amanda Stevens
Energy Star Appliance Program
Environmental Protection Agency

From: Edward Osann and Meg Waltner, Natural Resources Defense Council
George P. Slover, Consumers Union

Re: Comments on Draft 1, Version 6.0 Energy Star Residential Dishwasher
Product Specification

Summary

On behalf of the Natural Resources Defense Council (NRDC) and Consumers Union we respectfully submit the following comments on the EPA ENERGY STAR's Draft 1, Version 6.0 Residential Dishwasher specification. NRDC supports the adoption of Draft 1, Version 6.0 specification for residential dishwashers. Given the recent update in the federal standard and the high market share of dishwashers that meet the current ENERGY STAR specification, an update to the specification is appropriate. We support the proposed performance metrics for energy and water consumption and the new reporting requirements for cleaning performance and the inclusion of connected criteria. EPA has selected proposed metrics for energy and water consumption that represent the top 27 percent of available standard-sized models. EPA's analysis shows that these levels will provide cost-effective savings to consumers. Additionally, the cleaning performance reporting requirements will ensure that ENERGY STAR dishwashers continue to meet consumer expectations of performance.

Public disclosure of cleaning performance should be required after a period of transition.

We recommend that ENERGY STAR eventually provide for the public disclosure of cleaning performance scores after a brief period of data collection and evaluation. We understand that manufacturers may need time to work with the newly finalized Test Method for Determining Residential Dishwasher Cleaning Performance before consistently accurate and replicable test results can be achieved. Thus we accept the current proposal to withhold posting of reported test results. However, the objectives of both consumer protection and healthy competition will be advanced by making cleaning performance test result transparent and accessible at the earliest practical opportunity. EPA should state its intention to begin posting results within one year in the absence of a demonstrated need to modify the cleaning performance test procedure itself.

Thank you for the opportunity to submit these comments.

Sincerely,

Meg Waltner
Manager, Building Energy Policy
Natural Resources Defense Council

Edward R. Osann
Senior Policy Analyst
Natural Resource Defense Council

George P. Slover
Senior Policy Counsel
Consumers Union