



NRDC Comments on EPA ENERGY STAR's Version 6.0 Draft 2 Specification for Residential Dishwashers

July 22, 2014

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.4 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's Version 6.0 Draft 2 Specification for Residential dishwashers.

NRDC is pleased that EPA is updating the dishwasher specification and generally supports the proposed criteria. NRDC supports EPA's effort to update the ENERGY STAR specification for dishwashers given the large percentage of models that qualify for ENERGY STAR, the small difference between the current specification and the updated Federal standards, and the availability of higher efficiency products on the market. According to EPA's Version 6.0 Draft 1 cover letter, 89 percent of residential dishwashers sold in 2012 were ENERGY STAR. NRDC supports the efficiency levels in the proposed specification including the revised standard for compact dishwashers, which will provide cost-effective energy and water savings to consumers. EPA estimated that the updated specification will save an average consumer \$68 over the life of a standard-sized dishwasher and \$30 for compact dishwasher in reduced energy and water bills.

NRDC continues to emphasize the importance of cleaning performance and recommends that EPA move toward a mandatory reporting requirement of cleanability test results. NRDC strongly supports testing cleaning performance to ensure that all new Energy Star dishwashers continue to offer high performance of their essential functions. While EPA proposed to make reporting of cleanability test results mandatory in Draft 1, Draft 2 has relaxed this requirement and instead strongly encourages the reporting of cleanability test results. We recommend that EPA eventually transition to mandatory reporting and public posting of cleanability test results, within a year of finalization of the Version 6.0 specification. This will give manufacturers additional time to transition and allow time to work out any remaining issues with the test method, while still achieving the eventual goal of getting better data on cleaning performance. Without this data, it is likely that the ENERGY STAR program for dishwashers will need to eventually sunset as it will be difficult to update the specification further without better data on performance. This is counter to both consumer and manufacturer interests and so we urge EPA to make reporting of cleaning performance test results mandatory as soon as possible so that it can consider setting cleaning performance requirements the next time the specification is updated.

NRDC supports the inclusion of the energy credit for connected dishwashers, but recommend that multiple pathways of connection be required to qualify as connected. NRDC supports the inclusion of a five percent energy credit in the Version 6.0 Draft 2

Energy Star specification for dishwashers that meet the connected criteria. NRDC supports the comments submitted by the Consortium for Energy Efficiency on the technical specifications for the connected criteria and urges EPA to require the use of a connection path that does not rely on the customer's internet connection and a cloud based system. Ensuring that a utility can connect directly with the appliance will better enable the utilization of connected features in demand respond and load management programs, helping to achieve the intended benefits of the connected credit.

Thank you for the opportunity to submit these comments.

Sincerely,



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