

June 22, 2012

Mr. Christopher Kent
ENERGY STAR[®] Program Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Kent:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR Commercial Dishwashers Version 2 Draft Final Specification, released by the Environmental Protection Agency (EPA) on May 30, 2012.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and eight Canadian provinces. In 2011, CEE members directed \$7.8 billion of energy efficiency program budgets in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as our national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

We Support Rapid Advancement of Total Energy Consumption Metric as Basis for Specification

In our Draft 3 comments, we highlighted the need for total energy consumption performance data for all machine types to determine energy savings and cost-effectiveness with confidence and recommended that EPA commit to revising this specification within two years to include a metric

that takes into account all of the energy consumed by a machine in wash and idle modes (herein “total energy consumption metric”). We are pleased that EPA and DOE have responded to our recommendations by committing to work with industry to accelerate the development of a total energy consumption metric and basis to consider specification revisions in mid 2013.

The proposed performance levels for all equipment types - with the exception of flight type machines as explained below - are acceptable at this time.

CEE Does Not Support the Inclusion of Flight Type Machines in the ENERGY STAR Specification Due to Insufficient Energy Performance and Cost Data

EPA has proposed in the Draft Final specification to expand the specification scope to include flight type machines and to identify energy efficient flight type machines by limiting water consumption as a function of maximum conveyer area throughput per minute. Contrary to other machine types included in the specification, the Draft Final specification for flight type machines does not include a metric for idle energy rate. We are also not aware of any field or laboratory test data that demonstrates that water consumption is indeed an accurate predictor of flight type machine energy consumption. Also contrary to other machine types, it is our understanding that EPA does not have pricing data with which EPA can compare the relative cost to the end user of qualifying and non-qualifying flight type machines.

Given the lack of energy performance and cost data for flight type machines, CEE is concerned that ENERGY STAR labeled machines will not deliver cost-effective energy savings to the end user and that energy efficiency programs lack a sufficient basis to promote flight type machines as part of mass market commercial dishwasher programs. CEE continues to recommend that EPA exclude flight type machines from this specification until industry develops the test procedures and metrics necessary to estimate energy consumption and provides energy performance and incremental cost data to EPA to inform a flight type machine specification that ensures cost-effective energy savings to the end user.

Many energy efficiency program administrators offer support for energy efficient flight type machines through custom energy efficiency programs in which program administrators estimate or measure the energy savings for specific machines and applications. As more performance and use data become available (through custom programs, ENERGY STAR reporting requirements, or other means), we look forward to sharing what we learn and working with EPA towards a specification for flight type machines that provides cost-effective energy savings for end users.

Once again, CEE would like to thank the EPA for the opportunity to comment on the ENERGY STAR specification for Commercial Dishwashers, Version 2, Draft Final. Please contact CEE Program Manager Kim Erickson at 617-532-0026 with any questions about these comments.

Sincerely,

A handwritten signature in blue ink that reads "Ed Wisniewski". The signature is written in a cursive style with a prominent initial "E".

Ed Wisniewski
Executive Director