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January 27, 2011

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,

Thank you for the opportunity to comment on Version 2.0 of Energy Star's Specification for Commercial Dishwashers. The Southern Nevada Water Authority (SNWA) is a multi-agency organization committed to assuring the sustainability of southern Nevada's water resources and is a strong advocate for both local and national water conservation initiatives. SNWA appreciates and recognizes Energy Star's continuing leadership in the facilitation of energy and water efficiency. Our following comments are designed to highlight our support of Energy Star's significant work in facilitating efficiency in the commercial kitchen arena and help strengthen the latest version of the commercial dishwashers specification with practical insights.

Specification - General

SNWA is broadly supportive of the latest version of the specification and the consideration and strengthening of water efficiency in many of the specification attributes. SNWA recognizes that current and forthcoming model green standards such as the International Association of Plumbing and Mechanical Officials' *Green Plumbing and Mechanical Code Supplement* increasingly rely on EPA's Energy Star qualification as the sole basis for facilitating water efficiency for certain appliance types such as dishwashers.

Definitions

Terminology
SNWA supports Energy Star's move to align with the terminology in NSF/ANSI 170-2009 and the reorganized organization of sections to define stationary rack and conveyor designs and then sub-product designations.

Door Type Pot, Pan and Utensil Machines
Pot, pan and utensil machines are, in SNWA's understanding, specialized machines within the door type machines classification. Because EPA apparently has valid data on these machines and recognizing they have inherently different energy and water use characteristics, SNWA recommends development of an additional set of definitions and qualifications for these products on the basis that it is unlikely that a customer requiring such products can practically use just the more typical door type and Energy Star should strive to facilitate efficiency in this category (currently subcategory).

Scope

Flight-type Machines
Flight-type machines are of significant interest to SNWA given the large concentration of businesses that use this high-capacity dishwasher arrangement in the Las Vegas area. While SNWA is disappointed that flight type machines are excluded from Version 2.0 of the specification, SNWA agrees with EPA's concerns with the testing protocol and that these are a significant impediment to Energy Star developing the specification to include such machines. SNWA proposes that working with NSF to improve the testing protocol by requiring machines to test at the slowest dish conveyance setting is the most reasonable approach to guaranteeing a valid water and energy qualification level can be developed. With respect to questions of what metric to base such a specification on, SNWA suggests the most reasonable may be to examine intensity of energy and water use per unit conveyor belt surface area.

Qualification Criteria

Under Counter and Stationary Single Tank Door (excepting following) Machines
SNWA appreciates and supports EPA's efforts to strengthen both energy and water efficiency tiers for qualifying these machine types.

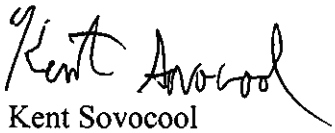
Door Type Pot, Pan and Utensil Machines
As touched on above in SNWA's comments on definitions, SNWA is proposing that EPA use the testing data to develop at least one new category to appear in Table 1 covering pot, pan and utensil machines with qualification levels such that Energy Star qualified machines would be at least 20% more water efficient than the average consumption (GPSF) for the suite of machines that have been tested.

Conveyor Machines
EPA explains the decision not to propose strengthening water efficiency for conveyor machines as follows: "EPA understands that existing water consumption levels for both single and multi tank machines (low and high temp models) continue to be challenging to manufacturers and reducing them further could reduce cleaning performance. Therefore, EPA focused its analysis on adjusting idle energy levels to align high and low temp designs and further differentiate products to achieve additional savings".

While SNWA acknowledges that there is of course some water use level (and energy use level) where cleaning performance is impacted, seemingly no data on cleaning performance with respect to water and energy use is presented in the accompanying website data to substantiate or support EPA's contention and justification. Without such data, EPA cannot credibly make such a decision without appearing to be biased towards reducing energy use at the expense of water. For this reason, to the extent data on cleanability is available EPA should provide this for interested stakeholders to review. Beyond simply providing such data, EPA is encouraged to recognize that there must be a balance in setting of each of the qualification criteria listed. Additionally, from a market presence perspective, the data provided seems to suggest that in terms of availability of machines there is little evidence that an exclusively energy-focused strengthening of the specification is desirable for Energy Star. Indeed, the data presented suggest a more balanced approach may allow more machines to qualify while providing for additional water efficiency.

SNWA appreciates the opportunity to comment on this Energy Star specification. If you have any questions regarding our comments, please contact me at kent.sovocool@snwa.com or call me at 702-862-3738.

Sincerely,



Kent Sovocool
Senior Conservation Research Analyst

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