

November 10, 2010

Amanda Stevens
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Stevens:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR Dishwasher Draft 1 Version 5.0 Specification, released by the Environmental Protection Agency (EPA) on October 4, 2010. The following comments, which were developed by the CEE Residential Appliance Committee (the Committee), are supported by the organizations listed below.

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 44 U.S. states and 8 Canadian provinces. In 2009, CEE members directed over \$6 billion of energy efficiency program budgets in the two countries. In short, CEE represents the groups that are actively working to make ENERGY STAR the relevant platform for energy efficiency across North America.

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 would like to thank EPA for the opportunity to provide comments on this specification revision and share our insight on the state of member dishwasher programs.

CEE would like to offer some context for these comments by describing the challenges that member energy efficiency program administrators are experiencing in designing dishwasher programs that pass their cost effectiveness tests. As you may be aware, generally speaking

efficiency programs may promote only those products that deliver energy savings sufficient to offset the costs of the promotion (i.e., that have a benefit/cost ratio of greater than 1.0). Due to the new federal standard for dishwashers that became effective on January 1, 2010, efficiency programs have been experiencing a declining per unit energy savings and increasing incremental retail prices to achieve higher levels of efficiency. As a result, we have seen a significant decrease in the number of CEE members who are able to offer dishwasher programs. Looking at the 2010 CEE Appliance Program Summary, only 40% of members were running dishwasher programs compared to the 70% running clothes washer or refrigerator programs. In addition, the only dishwasher programs currently being offered that CEE is aware of are bundling dishwashers with other appliances in order to make the promotion cost effective. It is with this backdrop that the Committee offers the following comments.

In general, CEE supports ENERGY STAR's efforts to keep the dishwasher specification up to date and relevant and to set levels that generate significant energy and water savings. The Committee also supports adherence to the ENERGY STAR guideline that approximately 25% of dishwasher models meet the proposed ENERGY STAR criteria once the specification becomes effective. We would like to review the technical basis and assumptions behind the projections that EPA has made regarding the increase in models that would meet the proposed levels (projected to rise from 10% now to 25% over the next year). Conclusions about the rate of new product introductions were not possible from the provided graph on national market share of ENERGY STAR qualified dishwashers (presented during the October 26th stakeholder meeting). Therefore, the Committee is unable to offer support for the proposed efficiency criteria. We request that EPA provide the bases and assumptions for market trend projections to all stakeholders.

In addition, the Committee seeks clarity regarding the intended purpose of EPA's incremental pricing analysis. If EPA is seeking to determine the minimum price increase to demonstrate only the cost of efficiency improvements, the numbers presented at the October 26th stakeholder meeting are reasonable. However, if EPA's goal is to understand, on average, how much more a consumer will be paying for an ENERGY STAR qualified model, then we recommend that average price (instead of minimum price) be used. CEE conducted an analysis of models meeting the proposed ENERGY STAR level that are available for purchase online through four major retailers, and found the average price to be significantly higher than the value presented by EPA. CEE requests that EPA clarify what purpose their incremental pricing analysis was intended to serve and revisit the pricing data if necessary.

To enable the Committee to provide more informed comments in the future, we request that EPA provide the raw data, calculations, and assumptions for energy savings, incremental price, and market share analysis with the release of any specification revision proposal.

Lastly, regarding cleaning performance testing, the Committee would like to understand whether EPA will require such testing to be conducted by an EPA-recognized laboratory and/or certification body similar to energy and water consumption testing or if testing will be able to be completed by any laboratory.

Thank you for your consideration of these comments. Please contact CEE Program Manager Eileen Eaton at (617) 337-9263 with any questions.

Sincerely,

A handwritten signature in black ink, reading "Marc J. Hoffman". The signature is fluid and cursive, with the first name "Marc" and last name "Hoffman" clearly legible.

Marc Hoffman

Executive Director

Supporting Organizations

PNM

Seattle City Light

Southwest Gas

The United Illuminating Company