



## HOSHIZAKI AMERICA, INC.

618 Highway 74 South, Peachtree City, Georgia 30269 Phone (770) 487-2331

October 7, 2011

Mr. Christopher Kent  
ENERGY STAR  
1725 I St., Suite 1000  
Washington DC, 20006  
Subject: Comments on ENERGY STAR Commercial Dishwashers V 2.0

Dear Mr. Kent,

ENERGY STAR has played a crucial role in highlighting the importance of energy efficiency in the eyes of the public. Hoshizaki America supports the objectives of updating the Commercial Dishwasher standard to Version 2.0. We understand that ENERGY STAR is only effective if it is referred to the top units, but the criteria for single tank door units needs to be addressed.

The reduction of idle energy use from 1.0 to 0.64 would leave the Hoshizaki America unit out of the eligibility for ENERGY STAR status. Hoshizaki America's unit JWE-620UA-6B has a water consumption rate of 0.53 (best in class for ENERGY STAR), and idle energy rate of 0.7. Looking at the plot of the units in this class, this machine is very close to the cutoff. Hoshizaki America requests the limit for idle energy rate be reduced to 0.75 to allow JWE-620UA-6B to remain in the ENERGY STAR program. The Hoshizaki America unit could save the end user between \$1000 and \$5000 per year compared to other ENERGY STAR units based on the extremely low water consumption and detergent rate. This reduced water and detergent use is not only good for the end user, but the environment also.

The Idle energy rate is an area Hoshizaki could research how to improve in the future, however it is not something that could be done immediately. The estimated cost of research and development to improve the Hoshizaki America unit to the proposed Idle Energy Rate would be \$300,000. This figure includes engineering development time, parts, internal testing, trial production, external testing for ENERGY STAR, and field testing of the newly designed unit.

Hoshizaki America understands the complexity needed to address all the ENERGY STAR standards. We hope that ENERGY STAR sees the good that can be received by consumers benefiting from the water savings offered by Hoshizaki America's unit under the ENERGY STAR program. Hoshizaki America looks forward to working with ENERGY STAR to improve the standard for Commercial Dishwashers.

Sincerely yours,

Stephen Schaefer