April 18, 2007

Ms. Rebecca M. Duff Project Manager ICF International 1725 Eye Street NW Suite 1000 Washington, DC 20006

Dear Ms. Duff:

Re: Draft Specifications for Commercial Dish Washers and Ice Machines

The purpose of this letter is to inform you that the Water Conservation Division of the Austin Water Utility supports the US Environmental Protection Agency's Energy Star Program specifications for commercial dish washers and ice machines. The specification for commercial ice machines and especially the exclusion of once through cooling follows what has happened in the City of Austin. Water cooled ice machines have been prohibited since December of 2005. The commercial dish washer standards also set achievable levels of water use for this type of operation.

The only addition that would be helpful concerns flight-type (rack-less) dish washers. Although specifications for this type of equipment is not part of this analysis, flight-type dish washers use from 72 to over 600 gallons an hour. Any guidance that Energy Star can give the purchaser regarding the range of water use would be helpful.

Sincerely,

David Juarez, P.E.

Assistant Director – Water Resource Planning

Austin Water Utility