East Bay Municipal Utility District Comments on ENERGY STAR Commercial Dishwashers Specification Draft #2

Commercial Dishwashers

- 1. We concur a one gal/per rack or less threshold is realistic.
- 2. We wish to point out that in real world conditions the "idle test" with the door closed is not practiced. While this is desirable for thermal retention, we caution that the test method may want to be expanded to include an "open door idle test", which may be more reflective of true idle energy use.