

Dear Ms. Duff,

Miele Inc. of Princeton, New Jersey, would like to provide the following comments regarding the Final Draft Energy Star Specification for Commercial Dishwashers:
Definitions: The Miele G7859 Commercial Dishwasher is a 208V 3 phase tankless, freshwater, undercounter commercial dishwasher. It has been tested and certified to the UL 921 standard for commercial dishwashers. It does not meet the definition of a domestic dishwasher as indicated in the DOE test procedure found in 10CFR430 Appendix C Subpart B. The final draft does not define this type of dishwasher and therefore excludes it from the Energy Star Program.
Efficiency Requirements:

The Miele G7859 Commercial Dishwasher is extremely efficient in both water consumption and electrical consumption without compromising cleaning efficacy. Performance testing to NSF 3 has resulted in satisfactory results and NSF approval is currently pending due to resolution of non performance(structural) issues.

Miele Inc. finds the limitation of definitions to tank style dishwashers only in the Draft Energy Star Specification for Commercial Dishwashers will virtually serve to eliminate the Miele G7859 Commercial Dishwasher from consideration in the commercial market and will discourage the development and use of new technologies to improve performance and efficiency of commercial dishwashers.

Sincerely,

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