

**Steering Committee for Water Efficient Products  
1001 Connecticut Avenue, NW Suite 801  
Washington, DC 20036**

June 7, 2006

Ms. Rachel Schmeltz  
Energy Star Program Manager  
Office of Air & Radiation  
US Environmental Protection Agency  
Washington, D.C. 20460

Re: Draft 1 Specification for Commercial Dishwashers

Dear Ms. Schmeltz:

We co-chair a steering committee formed from over one hundred organizations, companies, and water utilities that support a voluntary water-efficient product labeling program to be administered by the U.S. Environmental Protection Agency (EPA). Thank you for the opportunity to provide feedback on the Draft 1 Specification for Commercial Dishwashers, and for the extension of time to submit these comments.

1. **Product Categories.** We support the recommendation of some manufacturers to consider additional categories of dishwashers for designation by Energy Star. To the extent that relevant data exists and is made available, products such as glass washers and pots and pans washers should be considered for inclusion in this initial specification. If such data is not currently available, such subcategories should be evaluated during future revisions of the specification.

Additionally, further clarification is needed in the categories proposed in Draft 1, particularly regarding stationary door-type units. Performance characteristics of units with and without heaters are different enough to consider them as separate categories, and the performance metrics in Draft 1 for these products should be reconsidered after the recategorization of the products. The performance requirements in Table 1 may be either too high or too low, depending on the product type.

2. **Water Efficiency.** We support the use of the water consumption as determined under the NSF test procedure for determining eligibility for Energy Star. New test procedures to determine total energy use for all types of commercial dishwashers could take years to develop and adopt. We are satisfied that water consumption is a reasonably good surrogate for energy consumption, as well as being an important measure of machine efficiency in its own right. We believe that Energy Star should finalize this current round of specification development using the NSF-based water consumption metric, and undertake further review of energy

consumption test procedures and performance metrics in future years. Whether supplemented by an energy metric or not, water consumption should remain a requirement for Energy Star eligibility.

Commercial dishwashers offer an exciting opportunity for energy and water savings, and we strongly support the development of an Energy Star specification for these products. However, the Draft 1 specification needs substantial revision. We recommend that a Draft 2 be made available for public comment prior to adoption by Energy Star. Thank you for your attention to these views.

Sincerely,



Peter DeMarco, Co-Chair  
American Standard  
(732) 980-3472



Al Dietemann, Co-Chair  
Seattle Public Utilities  
(206) 684-5881

e-mailed to: Charles Anderson, ICF Consulting, [canderson@icfi.com](mailto:canderson@icfi.com)  
Rachel Schmeltz, EPA, [schmeltz.rachel@epa.gov](mailto:schmeltz.rachel@epa.gov)  
John Flowers, Water Office, EPA, [flowers.john@epa.gov](mailto:flowers.john@epa.gov)