

September 15, 2008

Mr. Richard Karney  
Energy Star Products Manager  
U.S. Department of Energy  
1000 Independence Avenue, SW, EE-2J  
Washington, DC 20585-0121

Dear Mr. Karney:

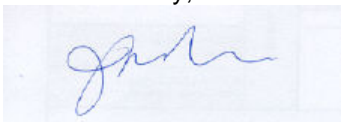
Thank you for the opportunity to provide comments on the August 15, 2008, proposal to revise the ENERGY STAR criteria for dishwashers. ACEEE supports the proposed criteria and timeframe for the Tier 1 and Tier 2 specifications.

The Tier 1 criteria represent a consensus between manufacturers and energy efficiency advocates. Moving forward, we are pleased to see the inclusion of Tier 2 criteria further increasing the energy and water efficiency of ENERGY STAR qualified dishwashers. Given the adoption of revised minimum efficiency standards taking effect in 2010 and the rapid growth in ENERGY STAR dishwasher market share in the past, it makes sense to establish and publicize a second tier now. The proposed Tier 2 effective date in 2011 provides a reasonable timeframe for product development and marketing.

ACEEE strongly supports the addition of water efficiency standards to the ENERGY STAR dishwasher criteria. We endorse the maximum water use requirements of 5.8 gallons per cycle for Tier 1 and 5.0 gallons per cycle for Tier 2. To further opportunities for energy and water savings from dishwashing, we encourage DOE to pursue public education efforts as part of its ENERGY STAR program outreach such as encouraging consumers to avoid hand pre-rinsing of dishes and to make better use of energy-saving settings on their dishwashers. We would look forward to opportunities to collaborate and comment on these efforts.

The proposed ENERGY STAR dishwasher criteria and timeline are a positive step forward in terms of energy and water savings. ACEEE supports your efforts and appreciates the opportunity to comment.

Sincerely,



Jennifer Thorne Amann  
Director, Buildings Program  
American Council for an Energy-Efficient Economy

Cc: Bill McNary, D&R International