

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:

I am responding to your request for comments on the proposal to revise the ENERGY STAR criteria for dishwashers dated August 15, 2008.

We applaud the proposal to include water use criteria into another Energy Star product. Adoption of these criteria expands the opportunities for water stakeholders to join with Energy Star partners in promoting products that save both energy and water. Discussions have already begun between energy and water utilities to cooperate on dishwasher rebate programs, promotions, and customer education efforts.

In addition to the hot water savings of the dishwashers themselves, an additional increment of energy savings will also be obtained from the reduction in embedded energy used to provide water and wastewater service by utilities.

Following the lead of the new federal standards for dishwashers effective in 2010 which include water use criteria, the addition of gallons per cycle to ENERGY STAR allows for a logical progression in product development and marketing for manufacturers between now and 2010. It also gives utilities and other stakeholders a consistent basis for incentive programs after July 1, 2009, progressing without disruption into the 2010 federal requirements and the Energy Star revisions proposed for 2011.

The metric of 5.8 gallons per cycle is reasonable given the water use of dishwashers currently on the market. It will allow more than 50% of the currently available dishwasher models to meet the water criteria. Machines that can meet the new proposed energy efficiency levels should have little difficulty meeting the proposed gallon per cycle water criteria, since the most common way to save dishwasher energy is to reduce overall water use. To maintain the premium level of savings intended for the Energy Star label, we support the strengthening of the criteria to 5.0 gallons per cycle in 2011, as proposed.



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The second tier of the proposed specification (307 kWh/year and 5.0 gallons per cycle) appears to be based on the second tier of the proposed appliance manufacturer's tax credit. Appliance manufacturers are seeking that tax credit as an incentive to invest in additional efficiency. We believe that this second increase in Energy Star efficiency should only be made if the corresponding tax credit incentive is enacted.

The pressing water problems from droughts, aging infrastructure, increased demands, and limited new supply options are becoming more prominent to citizens, regardless of where they are located. Water and wastewater concerns are no longer restricted to just a few western or coastal States or Provinces. Many citizens will be increasingly motivated to save water as well as energy, and having products that save both water and energy will greatly further their widespread adoption.

We support your proposed criteria and timeframe, and look forward to seeing this proposal adopted and other water efficiency criteria added to additional ENERGY STAR products in the future. Thank you for an opportunity to comment.

Sincerely,



Mary Ann Dickinson
Executive Director

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