



September 30, 2008

Rich Karney  
US Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

Dear Mr. Karney:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments on the ENERGY STAR Program Requirements for Dishwashers, released by DOE on August 15<sup>th</sup>, 2008. The comments were developed by the CEE Appliance Committee (Committee). The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

As stated in the Market Impact Outline on the Potential Revision of the ENERGY STAR Criteria for Dishwashers, periodic revisions to ENERGY STAR criteria are critical to protecting the value of the ENERGY STAR brand and ensuring its continued relevance in the marketplace. We agree that ENERGY STAR needs to provide meaningful differentiation from other products in the market, in part because efficiency programs base their savings estimates on this performance differential. As such, the Committee generally supports the proposed revisions to the ENERGY STAR criteria for dishwashers. We would like to emphasize our support for the more stringent energy and water efficiency levels that are proposed for 2011 and look forward to working with manufacturers and retailers to promote models that meet those higher efficiency levels.

However, due to the lengthy time period between the issuance of this proposal and the 2011 effective date for the more stringent levels, we strongly urge DOE to commit to revisit the proposed 2011 levels prior to their effective date to ensure that they are consistent with the guiding principle of capturing the top 25% of models. This should be done in sufficient time to gauge changes in the market and to allow all manufacturers to modify their production plans accordingly. If efficiency program efforts to promote high-efficiency dishwashers are successful, it is possible that market penetration will grow beyond the 25% that ENERGY STAR seeks to capture with its criteria (especially considering that these levels represent 16% of models today). If this is the case, we encourage DOE to increase the energy and water efficiency criteria to more appropriate levels. This is especially important given that the new federal standard going into effect in 2010 will result in smaller per-unit energy savings and efficiency programs will be seeking opportunities to promote models that deliver more significant savings to consumers.

We understand from the Department that many retailers are now stocking a high percentage of ENERGY STAR labeled dishwashers. While CEE is pleased to see retailers and manufacturers responding to strong consumer demand for ENERGY STAR

products, we are concerned about one possible implication of this practice. Based on our reading of the Department's Market Impact Outline, it appears that retailers' stocking practices was an important input to DOE's proposed levels, which—as noted above—capture more than the target 25% of models. Rather than increasing the percent of models ENERGY STAR recognizes, we recommend that DOE hold a meeting with all affected stakeholders to evaluate whether such a change to the basic tenants of ENERGY STAR is needed given the evolution of products and the market.

CEE also encourages DOE to work with efficiency and industry stakeholders to develop a test procedure to measure cleaning performance of dishwashers. We are concerned by DOE's mention that some higher efficiency models may have reduced cleaning performance. To more fully understand the implications of increases in efficiency on product cleaning performance, it is clear that a test procedure is needed. CEE looks forward to any opportunities to assist in this area.

Thank you for your consideration of these comments. Please contact CEE Program Manager Eileen Eaton at (617) 589-3949 ext. 203 with any questions.

Sincerely,



Marc Hoffman  
Executive Director

CC: Stephen Witkowski, DOE

**Supporting Organizations**

BC Hydro  
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NSTAR  
Oregon Department of Energy  
Pacific Gas and Electric Company  
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