



GE Consumer & Industrial

Earl F. Jones, Jr.
Senior Counsel – Government Relations
& Regulatory Compliance

Appliance Park, AP2-225
Louisville, KY 40225

T 502 452 3164
F 502 452 0395
earl.f.jones@ge.com

September 15, 2008

Via email: RICHARD.KARNEY@ee.doe.gov

Mr. Richard Karney
Energy Star Program Manager
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, S.W.
U.S. Department of Energy
Washington, DC 20585-0121

Re: Comments on Proposed Revisions to the ENERGY STAR Dishwasher Program

Dear Mr. Karney,

On behalf of General Electric, Consumer & Industrial (GE), I am pleased to submit the following comments concerning the proposed revisions to the ENERGY STAR criteria for the dishwasher program to address changes in the federal minimum efficiency standards that will take effect on January 1, 2010. GE is a strong supporter of ENERGY STAR, and believes in standards for appliance products that provide energy savings and economic benefit to consumers and also benefit the nation as a whole. As such, we are providing these comments to you for your consideration.

GE fully supports the proposed 2009 dishwasher ENERGY STAR level of 324 kWh/year with a Water Factor (WF) of 5.8 gallons/cycle. As the department is aware, this level resulted from negotiations between GE and other manufacturers and energy efficiency advocates. These negotiations also covered proposals for minimum product standards and efficiency levels at which products would qualify for manufacturer tax credits in a proposed extension of the tax credit program originally adopted in EPACK 2005, which were scheduled to expire at year-end 2007. As was the case in the 2005 statute, ENERGY STAR units would qualify for a tax credit.

The 307 kWh/5.0 level proposed by the Department as the dishwasher ENERGY STAR Tier 2 effective in 2011 was proposed by the parties to the negotiating as the qualification level for the higher tax credit amount, which could be claimed for better-than-ENERGY STAR units. Implicit in this aspect of the agreement was recognition that achieving this higher level of efficiency would require significant investment to develop and manufacture such units.

The negotiating parties worked together to include the provisions of their agreement in the 2007 energy bill. Unfortunately, they enjoyed only partial success, i.e., the agreed-upon minimum standards (and the rulemaking schedule for products for which standards could not be agreed upon) was enacted but the manufacturer tax credits to incentive the transition of the market to ENERGY STAR and higher-efficiency products became embroiled in the larger House-Senate conflict over tax-related energy provisions and did not emerge from conference.

The adoption of the 307 kWh/year/5.0 G/C Tier 2 ENERGY STAR dishwasher specification without the tax incentives designed to make it feasible, would not only reduce the ability of manufacturers to achieve this level, it would also undermine the integrity of the prospect of stakeholders jointly resolving and proposing energy standards under NAECA and the ENERGY STAR program. Should the tax credit extender package become law between now and 2011, the Department would have ample time to propose further revisions to the criteria.

GE continues to be a strong supporter of the Department's efforts to improve the efficiency of the nation's appliances. Please feel free to contact me at (502) 452-3164 or Earl.F.Jones@ge.com with any questions.

Sincerely,



Earl F. Jones