

September 15, 2008

Mr. Richard H. Karney, P.E.
US Department of Energy
Forrestal Building
1000 Independence Avenue, SW
Washington, DC 20585 -0121

Dear Mr. Karney:

Re: Position of Natural Resources Canada on ENERGY STAR Dishwasher Criteria for 2009 and 2011

Natural Resources Canada would like to thank you for the opportunity to comment on the new proposed changes for the ENERGY STAR dishwasher criteria for 2009 and 2011.

The *Office of Energy Efficiency of Natural Resources Canada* agrees that the qualifying levels should be changed for the ENERGY STAR qualified dishwashers in order to follow-up with the upcoming federal changes (January 1, 2010) as well as those proposed to come into effect in Canada on the same date.

Since there are no data available for 2009 or 2011 yet, it is difficult to predict the impact of the new ENERGY STAR specifications (TAEC vs. EF and WF) on qualified models available in the Canadian market in 2009 and 2011. However, as noted in previous submissions we continue to be concerned that high performance products, with low TAEC, will be eliminated because of WF - which reduces choice for consumers.

In our opinion, the WF would only be a significant factor on a regional basis (in some provinces there is no charge for water) and that it is not considered as a universal criteria (value of water varies significantly across the continent) such as TAEC for product selection by the consumers. Additionally ENERGY STAR should not try to address the regional requirements by setting a

very stringent WF. This also supports our objective of setting a WF in a manner that the ENERGY STAR qualified products do not use more water than non-ENERGY STAR products.

In summary, we agree with the proposed implementation of the two Tiers and their effective dates for dishwashers. We hope, that the market will continuously provide a good selection of ENERGY STAR and non-ENERGY STAR qualified models.

Thank you for the opportunity to comment.

Best Regards,



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cc: Katherine Delves
Anne Wilkins