

Seattle Public Utilities

Chuck Clarke, Director

September 11, 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. Comments have also been provided electronically, per your request.

We support your proposed two phase criteria and timeframe. Dishwasher efficiency has made great strides in the past few years, and more frequent updates to ENERGY STAR is appropriate to help guide consumers toward the most efficient products in a rapidly changing marketplace. We applaud the proposal to include water use criteria into another Energy Star product. The City of Seattle is now considering a cooperative program between our energy and water utilities to help promote more efficient dishwashers.

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.

If our experience with efficient clothes washers is any indicator, products that save both water and energy will be much easier to market to our customers. Thank you for an opportunity to comment.

Sincerely,

Al Dietemann

Acting Resource Conservation Manager

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