

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy

February 24, 2022

Ga-Young Park
Product Manager for Appliances
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Residential Dishwasher Version 7.0 Draft 2 Specification

Dear Ms. Park,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and American Council for an Energy-Efficient Economy (ACEEE) on the Residential Dishwasher Version 7.0 Draft 2 Specification released on January 6, 2022. We appreciate the opportunity to comment.

We support maintaining the revisions to the minimum energy and water efficiency requirements that were proposed in Draft 1. EPA has proposed to align the Version 7.0 specifications with the 2020 ENERGY STAR Most Efficient (ESME) criteria. As EPA notes in the Draft 2 specification cover memo, the market penetration of ENERGY STAR qualified dishwashers has increased to nearly 100% in 2020.¹ Therefore, we believe the revised efficiency criteria will be critical to ensuring market differentiation for ENERGY STAR certified products. Based on actual prices of dishwashers in the market, EPA found that the incremental cost of a model meeting the proposed Version 7.0 specification relative to a model just meeting the minimum DOE standards would be paid back in less than 4 years.²

We support the inclusion of a cleaning performance requirement but encourage EPA to maintain a minimum cleaning index of 70. EPA is proposing to require that dishwashers meet a minimum cleaning index based on the ENERGY STAR Test Method for Determining Residential Dishwasher Cleaning Performance. This will ensure that only dishwashers that provide adequate cleaning performance will be able to be certified to the ENERGY STAR specification and will align the ENERGY STAR test requirements with the cleaning performance test method in the proposed DOE test procedure.³

However, EPA is proposing to revise the threshold per-cycle cleaning index from 70 in Draft 1 to 65 in Draft 2 to align with DOE's proposed test procedure. While we understand that EPA is looking to harmonize the test requirements with DOE's proposed test procedure, we do not believe that the threshold per-cycle cleaning index needs to align with DOE's proposed cleaning index threshold. Instead, we encourage EPA to maintain the threshold per-cycle cleaning index at 70 in order to align with the

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https://www.energystar.gov/sites/default/files/asset/document/2020%20USD%20Summary%20Report_Lighting%20%20EVSE%20Update.pdf.

² ENERGY STAR Draft 1 Version 7.0 Residential Dishwasher Data & Analysis Package.

³ <https://www.regulations.gov/document/EERE-2016-BT-TP-0012-0013>.

2020 ESME criteria⁴ (as EPA has done with the proposed efficiency requirements). In addition, a superior cleaning index threshold will help differentiate the cleaning performance of ENERGY STAR models compared to standard models in the market.

Thank you for considering these comments.

Sincerely,



Kanchan Swaroop
Technical Advocacy Associate
Appliance Standards Awareness Project



Amber Wood
Director, Buildings Program
American Council for an Energy-Efficient Economy

⁴ The 2022 ESME criteria similarly include a minimum cleaning index of 70.