



NRDC Comments on EPA's ENERGY STAR Most Efficient 2015 Proposed Criteria for Dishwashers
October 22, 2014

On behalf of the Natural Resources Defense Council (NRDC) and our more than 1.4 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's supplemental proposed criteria for dishwashers for the Most Efficient 2015 designation. NRDC has been a longtime supporter of the ENERGY STAR program and continues to strongly support the addition of the Most Efficient designation to the program.

As submitted in our previous comments, NRDC supports the addition of dishwashers as a new product category for the 2015 Most Efficient designation. The addition of this product category is warranted given the availability of higher efficiency dishwashers compared to the baseline ENERGY STAR criteria and the consumer interest in efficiency in this product category. As stated in previous comments, NRDC strongly supports the inclusion of a cleaning test performance requirement and would not support the addition of dishwashers as a product category without this requirement.

In our previous comments, NRDC recommended that EPA include cleaning performance requirements for additional cycles, rather than just the "heavy" test cycle as proposed. We are very pleased to see EPA's supplemental proposal which includes cleaning performance requirements for the "light" and "medium" cycles. Testing cleaning performance in all three cycles will ensure that dishwashers perform well across all cycles, providing consumers with the energy, water, and cleaning performance they expect. As indicated previously, if cleaning performance were to only be tested in the heavy cycle this could lead to consumer dissatisfaction and potential loss of energy and water savings if performance in other cycles was lacking, leading consumers to select the "heavy" cycle which most likely would use more energy and water.

The need for a cleaning performance requirement is supported by Consumer Reports test data. Consumer Reports data¹ suggests that dishwasher cleaning performance varies both in general across all models and for energy efficient models, specifically. Of the 110 models rated as "excellent" for energy efficiency, washing performance ranges from "fair" to "excellent," with 70 models achieving the "excellent" rating. Notably of the 181 total models in the database, the four models rated as "fair" for washing performance (the worst score given) are also models that rate as excellent for energy efficiency. This data indicates that there is a range of cleaning performance between models and that high efficiency models can achieve excellent cleaning performance. It also indicates that there

¹ Models rated by Consumer Reports, available at: <http://www.consumerreports.org/>, accessed 10/20/14

are some lower performing models in terms of cleaning performance. Because of this variation in performance, EPA should set a cleaning performance requirement for dishwashers as proposed. This will ensure that the integrity of the ENERGY STAR brand name is maintained and that consumers realize the expected energy, water, and cleaning performance.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Meg Waltner", with a long horizontal flourish extending to the right.

Meg Waltner
Manager, Building Energy Policy