



POLICY & ACTION FROM CONSUMER REPORTS

June 25, 2018

Appliance and Equipment Standards Program
U.S. Department of Energy
Building Technologies Office
950 L'Enfant Plaza SW, Suite 600
Washington, DC 20024

**Comments of Consumers Union
Energy Conservation Program: Energy Conservation Standards
For Dishwashers, Notification of Petition for Rulemaking
83 Fed. Reg. 17,768 (Apr. 24, 2018)
Docket No. EERE-2018-BT-STD-0005**

Consumers Union, the advocacy division of Consumer Reports,¹ submits these comments in the above-referenced matter. We are in general agreement with the comments being submitted by the Appliance Standards Awareness Project et al., and by Earthjustice et al., and we recommend that the Department deny the petition. We are writing separately to highlight certain information from Consumer Reports' own research and testing that we believe will assist the Department in reaching the conclusion that the petition should be denied.

In our view, there is no need to create a new dishwasher category with a cycle of one hour or less, and thus risk undermining the current energy efficiency standard. The current standard does not preclude any dishwasher from having more than one cycle, including a "quick cycle" of one hour or less. Indeed, most dishwashers on the market today already have at least three cycles for the consumer to choose from, including a quick cycle.

¹ Consumers Union is the advocacy division of Consumer Reports, an expert, independent, non-profit organization whose mission is to work for a fair, just, and safe marketplace for all consumers and to empower consumers to protect themselves. Consumers Union works for pro-consumer policies in the areas of fuel efficiency and energy conservation, transportation, financial services, food and product safety, health care, telecommunications and technology, privacy and data security, antitrust and competition policy, and other consumer issues, in Washington, D.C., in the states, and in the marketplace. Consumer Reports is the world's largest independent product-testing organization, using its dozens of labs, auto test center, and survey research department to rate thousands of products and services annually. Founded in 1936, Consumer Reports has over 7 million subscribers to its magazine, website, and other publications.

The current standard requires that the cycle most commonly used by the consumer shall be the cycle tested as the “Normal” cycle that must meet the standard.² But a manufacturer is free to add additional cycles and – as long as a cycle is not the Normal cycle, but is designated as “special use,” or infrequently used – its water and energy consumption are not limited by the standard.

Rather than creating a new dishwasher category, the Department should consider regulating more than just the Normal cycle. That is, it would be beneficial to have energy and water limitations for the shorter cycle(s), and this requirement can be added to those for the Normal cycle. We note that Consumer Reports’ most recent tests of 11 new dishwasher models show that they used, on average, 353 more watt-hours and 2.4 more gallons of water in the Quick cycle (with a heavy soil load) than in the Normal cycle (with DOE’s lightly soiled load) – even though most Quick cycles do not use heated dry, as the Normal cycle does.

Another reason that this petition should be denied is that our own research, using both quantitative and qualitative studies, has shown that consumers are generally not concerned about the length of their dishwasher’s run time. This is because most consumers run their dishwashers overnight, as most dishwashers are now quiet enough to run without disturbing sleep.

Our findings are based on Consumer Reports’ 2017 Spring Dishwashers Survey of 74,880 Consumer Reports members who purchased a new dishwasher between 2007 and 2017. The survey was fielded from April through June 2017. We found:

- 87% of survey respondents reported that their most frequently used cycle was the either the Normal/Regular or Auto/Smart cycle and 66% of respondents reported using the Normal/Regular cycle more than 50% of the time.
- Only 6% of survey respondents reported that their most frequently used cycle was the Quick/Express/1-hour cycle.
- 27% of survey respondents reported using the Quick/Express/1- hour cycle at least some of the time, and the reported usage of the Quick/Express/1-hour cycle was similar to reported usage of other non-normal cycles such as “Heavy Duty” or “Pots & Pans.”
- 67% of survey respondents reported that they ran their dishwasher at the end of the evening and unloaded it the next day.

These findings are further supported by a qualitative consumer engagement testing study that Consumer Reports conducted, from December 5-9, 2016, with 16 consumers across the nation who had purchased a new dishwasher between 2011 and 2016. Most indicated that they

² The DOE standard states: “Normal cycle means the cycle type, including washing and drying temperature options, recommended in the manufacturer’s instructions for daily, regular, or typical use to completely wash a full load of normally soiled dishes including the power-dry feature. If no cycle or more than one cycle is recommended in the manufacturer’s instructions for daily, regular, or typical use to completely wash a full load of normally soiled dishes, the most energy intensive of these cycles shall be considered the normal cycle. In the absence of a manufacturer recommendation on washing and drying temperature options, the highest energy consumption options must be selected.” Uniform Test Method for Measuring the Energy Consumption of Dishwashers, 10 C.F.R. Part 430, Subpart B, Appendix C1, 1.12, https://www.ecfr.gov/cgi-bin/text-idx?SID=dbd68f6d079d9f560e0a667d4235b0d7&mc=true&node=ap10.3.430_127.c1&rgn=div9.

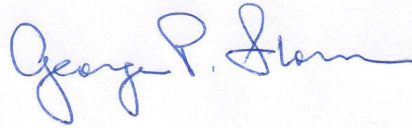
run their dishwasher overnight or before work, so that the cycle time was not a concern. Those who noticed the increased cycle time were not bothered by it.

With the numbers and frequency of dishwashers in use across the country, there are tremendous energy savings from maintaining current standards, and improving on them when possible. The law is working as it should. The current standard allows for other cycles to be included for the occasions when consumers need them. Changing the standard as proposed in the Petition is unnecessary, and ill-advised, as detrimental to sound energy conservation objectives.

Respectfully submitted,



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