



## Department of Energy

Washington, DC 20585

April 3, 2012

### VIA EMAIL

Ms. Leslie Jones  
ENERGY STAR Program  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Room 62023  
Washington, DC 20460

Dear Ms. Jones:

The U.S. Department of Energy ("DOE") selected an Electrolux Major Appliances North America ("Electrolux") dishwasher, basic model EIDW6305\*\*\* ("model EIDW6305\*\*\*"), for testing as part of the DOE's ENERGY STAR® Verification Testing Program. DOE's initial testing, performed on a single unit of this model, indicated that it might not meet the ENERGY STAR requirement for maximum annual energy consumption. In accordance with DOE's procedures for conducting verification testing in support of ENERGY STAR, DOE would normally test three additional units to determine whether the basic model meets the ENERGY STAR specification.

DOE has been unable to procure and test three additional units of model EIDW6305\*\*\*. Electrolux informed DOE via email on January 27, 2012, that model EIDW6305\*\*\* has been discontinued and replaced by model EIDW6305\*\*\*A.<sup>1</sup> DOE understands, however, that model EIDW6305\*\*\* (which has an estimated yearly electricity use of 324 kilowatt hours per year (kWh/yr), according to its Energy Guide label) is a different basic model than basic model EIDW6305\*\*\*A (which has an estimated yearly electricity use of 299 kWh/yr).

In addition, based on information that Electrolux provided in a February 17, 2012 email, it appears that Electrolux misinterpreted, and thus failed to test in accordance with, DOE's dishwasher test procedure. *See* 10 C.F.R. 430, Subpart B, Appendix C. This misunderstanding may explain the discrepancy between Electrolux's rated efficiency and DOE's test results. DOE informed Electrolux of Electrolux's apparent error via email on February 22, 2012.

Because DOE has been unable to obtain a sufficient number of units of model EIDW6305\*\*\*, DOE is not able to determine whether the model meets the relevant ENERGY STAR

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<sup>1</sup> On February 17, 2012, Electrolux confirmed via email that no units of model EIDW6305\*\*\* remained in inventory.



requirement. DOE's test result for annual energy consumption (348 kWh/yr), however, suggests that the model may exceed the relevant ENERGY STAR requirement for annual energy consumption (324 kWh/yr).<sup>2</sup>

Please feel free to contact me at 202-287-5772 should you require any further information.

Sincerely,

  
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Laura L. Barhydt  
Assistant General Counsel  
for Enforcement

Cc: George Hawranko, Electrolux Major Appliances North America  
(george.e.hawranko@electrolux.com)

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<sup>2</sup> To qualify for the ENERGY STAR program, a model must meet the requirements in the ENERGY STAR specification in effect on the date of manufacture. The ENERGY STAR requirement for maximum annual energy consumption was 324 kWh/yr between August 11, 2009 and June 30, 2011; a more stringent requirement (307 kWh/yr) took effect on July 1, 2011. DOE has not confirmed the date of manufacture of the unit DOE tested. DOE's test results indicate that model EIDW6305\*\*\* may not meet the relevant ENERGY STAR requirement, irrespective of which version of the ENERGY STAR specification would apply.