

Date: May 9, 2011

To: ESTARVerificationTesting@ee.doe.gov

From: Mary Ann Dickinson, President and CEO

Re: Comments on DOE Verification Testing in Support of Energy Star
(www1.eere.energy.gov/buildings/appliance_standards/pdfs/estar_verification_process.pdf)

The Alliance for Water Efficiency is pleased to provide DOE with comments on the above document. We are a North American non-profit organization, composed of diverse stakeholders with significant experience in water efficiency programs and conservation policies. Our mission is to promote the efficient and sustainable use of water, to promote cost-effective water efficiency measures that will reduce wasteful consumption, reduce the need for additional drinking water and waste water capacity, and provide multiple energy, economic, and environmental benefits. And in that mission, we work closely with staff at the Environmental Protection Agency (EPA).

The document frequently refers only to expected energy savings. Since Energy Star labeled products can cover both energy and water efficiency, the document and other references should acknowledge both energy and water savings benefits.

It would be helpful if the document could be organized into two sections, one that covers the temporary verification testing for the State Energy Efficient Appliance Rebate Program (SEEARP), and a separate section that covers long term testing as part of ENERGY STAR. Details of each type of testing became confused in the document when both were mixed together.

It was refreshing to see that DOE and EPA have collaboratively adopted similar testing programs for ENERGY STAR products. These appear substantially the same as previously adopted testing for the EPA WaterSense label. It would have been helpful in the document to confirm similarities, and/or identify any differences. In Section 3, roles and responsibilities, an effort could be made to better distinguish DOE covered products from other Energy Star labeled products. The roles of DOE and EPA are still somewhat confusing, and a table, such as provided on page 36 of the 2011 DOE-EPA Work Plan dated March, 2011, would help clarify responsibilities between agencies.

In the document, the term “performance” is used narrowly, with the implied definition that performance is a pass-fail measurement of a specific energy or water use metric. This performance definition is understandable when testing to meet a minimum efficiency metric for a federally regulated product. However, ENERGY STAR is a voluntary product label representing premium efficiency. Performance should include functional completeness (does the product accomplish what is intended with good consumer satisfaction) as well as meeting the premium efficiency metrics. Consumers expect that an ENERGY STAR labeled product will save energy and water, but also provide satisfactory functional performance. What good is a clothes washer or dishwasher that is efficient, but doesn’t get clothes or dishes clean?



P.O. Box 804127
Chicago, IL
60680-4127

OFFICE
(773) 360-5100

TOLL-FREE
(866) 730-A4WE

FAX
(773) 345-3636

WEB
www.a4we.org

For many ENERGY STAR products, manufacturers or their trade associations have developed industry accepted functional performance tests. In some cases DOE has adopted or adopted with modification similar test procedures. To help ensure the integrity of the Energy Star label, DOE should consider using these performance metrics, or modify or create them if needed, and make functional tests part of their overall ENERGY STAR performance testing.

More clarification would be helpful concerning products that fail testing. While it is important that manufacturers be consulted, no information is provided about next steps following manufacturer consultations. Since results of testing won't be made public, the integrity of the label requires that some sort of established process be followed for failed product to regain listing status.

Thank you for the opportunity to comment.