

Message

From: Myron Ebell [Myron.Ebell@cei.org]
Sent: 6/5/2018 8:12:42 PM
To: Myron Ebell [Myron.Ebell@cei.org]
Subject: Cooler Heads Coalition: next meeting Monday, 11th June, and action item
Attachments: ATT00001.txt

The Cooler Heads Coalition will hold its June strategy meeting beginning at 12 noon on Monday, 11th June, at CEI, 1310 L Street, N. W., Seventh Floor. Please e-mail or ring me at

Ex. 6 with questions or agenda items.

ACTION ITEM:

CEI's Sam Kazman has filed a petition with the Department of Energy that gets around the energy efficiency standards required by DOE for new dishwashers that make them slow and not very good at getting dishes clean. We have asked DOE to create a new class of "fast dishwashers" that can complete a cycle in an hour or less. This will require more electricity and more water and so DOE will have to relax the efficiency standards for this new class.

DOE has opened a public comment period, which ends on 25th June. We encourage other organizations to file comments and to encourage their members to file comments at www.dishwasherchoice.com. Comments do not need to be long, but they should be personal and not form letters. Over twelve hundred comments have already been filed with the help of FreedomWorks and several other groups.

→ File comments at www.dishwasherchoice.com. Deadline is June 25. ←

The Department of Energy notice and CEI's petition can be found at <https://www.regulations.gov/document?D=EERE-2018-BT-STD-0005-0001>. At that link, use the "Comment Now!" button in the upper right to file your own comments, or use www.dishwasherchoice.com.

Energy Department Petitioned To Stop Making Dishwashers Even Crappier

TIM PEARCE, Energy Reporter, *The Daily Caller*
1:45 PM 03/22/2018



A conservative think tank is petitioning the Department of Energy (DOE) to adopt a new energy efficiency standard for dishwashers that can cycle in an hour or less.

The Competitive Enterprise Institute (CEI) sent a petition to the DOE Wednesday, pointing out an unintended consequence of increasingly strict standards on energy and water standards: dishwasher cycle time.

“It used to take you only an hour to get a full load of dishes washed and dried in your dishwasher. Today, thanks to federal energy efficiency standards, the average time is nearly 2.5 hours,” CEI General Counsel **Sam Kazman** said in a statement. “That’s not progress; it’s bureaucracy. And for many consumers, it’s a royal pain. We hope the Department of Energy will change course.”

Dishwasher cycle times have not averaged an hour or less since 1983, before the DOE began regulating dishwashers. A lengthy wash cycle time is one of four major sources of dissatisfaction Americans have with dishwashers.

In 1987, Congress passed the National Appliance Energy Conservation Act (NAECA), establishing minimum efficiency standards for many appliances, including dishwashers. Subsequent regulations increased standards and mandated the DOE keep to a schedule to review efficiency standards and update them as necessary.

Congress did not intend to sacrifice other features for an ever-increasing energy efficiency standard when passing NAECA and other regulations, and it passed a provision to “preclude DOE from promulgating a standard that manufacturers are only able to meet by adopting engineering changes that eliminate performance characteristics,” the provision states, according to CEI.

The National Energy Conservation Act of 1978 gave the Secretary of Energy authority to create an entirely new class of appliance and set of standards within a type of product. Under this power, Energy Secretary Rick Perry could create a class of dishwasher that is able to complete a cycle in an hour without discarding the rules adopted so far.

The move would give manufacturers more flexibility in dishwasher design and as lines of one hour cycle dishwashers come to market, give consumers a choice of product no longer in existence due to government regulation, CEI argued.

“Dishwasher speed is an important factor for huge numbers of consumers,” the CEI petition states. “Manufacturers clearly have the ability to satisfy these consumers, and the DOE has the discretion under the law to accommodate them. It should do so.”

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