



SUB·ZERO GROUP, INC.

2866 Buds Drive, Fitchburg, WI 53719  
P: 800.532.7820 P: 608.271.2233

June 30, 2022

Via E-Mail

Katharine Kaplan  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program

appliances@energystar.gov

Re: ENERGY STAR Program Requirements, Product Specification  
for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 7.0

Dear Ms. Kaplan:

The Sub Zero Group (Sub Zero) respectfully submits the following comments to the Environmental Protection Agency (EPA) regarding the ENERGY STAR Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 7.0.

Sub Zero is a family-owned company that has been headquartered in Madison, Wisconsin for over 70 years. Sub Zero developed the niche market for customized built-in refrigerators, freezers, coolers and combination cooler products. We manufacture these, as well as Wolf high performance cooking products and Cove dishwashers, in the U.S., in Wisconsin and in Arizona. Since Congress' initial efforts over forty years ago, we have been a supporter of the Appliance Standards Program to reduce appliance energy consumption while working to maintain the utility and market attractiveness of our products for our customers.

We are in full agreement with the comments submitted by AHAM, our trade association, which provided you with our industry's knowledge of the facts surrounding why a decision to update the requirements for achieving ENERGY STAR has substantially negative consequences for consumers. With its final draft, EPA makes it clear that it is planning to finalize updated requirements for achieving the ENERGY STAR designation that will achieve minimal energy, water, or utility bill savings. These new requirements threaten to undermine the ENERGY STAR program by associating the ENERGY STAR mark with poor value, poor performance, and lack of reliability due to qualification requirements that are ineffective and highly variable.

1. **Minimal Energy Savings, No Lifetime Payback:** The Department of Energy (DOE) has done an analysis that finds that moving from ENERGY STAR Version 6.0 criteria to the proposed Version 7.0 criteria will save consumers only three dollars per year in energy costs, but will add \$82 in cost for a new product. That analysis shows that consumers will not recover that additional cost through savings on their energy and water bills during the lifetime of the dishwasher. Consumers should not have to bear this exceptional extra cost for minimal energy savings just to obtain a more energy efficient dish washer than current models, particularly during this time of extraordinary inflation.
2. **Dishwasher Performance Affected:** ENERGY STAR, for the first time, is mandating a cleaning performance test for dishwashers. This test is deeply flawed. First, the test is not great for



cleaning: the test ignores grease and detergent build up which are key cleanliness criteria for consumers. Second, the test ignores all other elements of performance that matter to consumers: noise, cycle length, and drying effectiveness. All of these performance factors are likely to suffer under ENERGY STAR's proposed standards.

3. **Performance Test is Unreliable:** The ENERGY STAR performance test is not designed to do what EPA is asking of it. It produces highly variable results, which are unreliable for EPA's intended use. Unreliable test results are harmful to consumers, manufacturers, and the Energy Star program.

The Sub Zero Group's Cove branded dishwasher is an integral part of our niche market within the appliance industry. Our consumers are very demanding and selective in which appliances they purchase. While cost and aesthetics are critical to their decision-making process, high performance is a non-negotiable. The EPA's decision to update the requirements for Energy Star is a clear and present danger to our brand's ability to meet the performance expectations of the Cove customer while simultaneously being competitive in the market with the Energy Star rating. We adamantly request that the EPA not move forward with a decision to increase the stringency of Energy Star. In effort to maintain our value proposition in the marketplace, we need to be able to deliver on the high-performance standards that our customers have grown to expect.

Respectfully submitted,

Christopher M. Jessup  
Director of Quality & Regulatory Compliance, Sub Zero Group, Inc.  
Email: [Christopher.Jessup@subzero.com](mailto:Christopher.Jessup@subzero.com)  
Phone: 608.270.3364  
Website: <https://www.subzero-wolf.com>

Cc: James Bakke, President/CEO, Sub Zero Group, Inc.  
Doug Swank, Vice President, Wolf/Cove Design Engineering, Sub Zero Group, Inc.  
Robert Schroeder, Vice President, Quality, Reliability & Customer Service, Sub Zero Group, Inc.  
Jennifer Cleary, Vice President, Regulatory Affairs, AHAM