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ASAP ACEEE EJ SC Commercial Dishwasher Standards Comments

Additional submitted attachment is included below.

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Earthjustice
Sierra Club

May 12, 2026

California Energy Commission
Docket Unit
715 P Street, Sacramento, CA 95814

RE: Docket No. 26-AAER-01: Commercial Dishwashers

Dear Alejandro Galdámez:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), Earthjustice, and Sierra Club on the California Energy Commission (CEC) Draft Staff Report for commercial dishwashers. We appreciate the opportunity to provide input to the Commission.

We strongly support the Staff proposal to adopt commercial dishwasher standards consistent with ENERGY STAR v3.0. The proposed standards would deliver meaningful reductions in statewide energy and water use, translating to approximately $200 million in annual utility bill savings after full stock turnover, and are highly cost-effective for purchasers.[1] The proposal also aligns with the broader market trend toward v3.0 and would build further momentum toward it becoming the norm for commercial dishwasher efficiency.

The proposed standards would deliver substantial energy and water savings. The proposed standards would set requirements for idle energy use, washing energy use, and water consumption across common commercial dishwasher types.[2] Compared to ENERGY STAR v2.0, the v3.0-aligned proposal introduces lower maximum idle energy rates and adds washing energy use requirements that were absent in v2.0. The Staff Report estimates that the per-unit savings are significant for all product types: annual electricity savings range from about 1.4 to 62 MWh,[3] water savings from about 3,000 to 235,000 gallons,[4] and gas savings from about 3.3 to 238 MMBtu (33 to 2,380 therms) for units with gas booster heating.[5]

Statewide, the proposed standards would yield electricity savings of about 28 GWh, gas savings of about 2.5 million therms, and water savings of 373 million gallons in the first year of implementation.[6] Annual

[1] p. 1, Draft Staff Report. efiling.energy.ca.gov/GetDocument.aspx?tn=268978&DocumentContentId=106172
[2] The proposed standards cover these commercial dishwasher types: undercounter; door-type; conveyor; flight type; certain glasswashers; and pots, pans, and utensils (PPU) washers. Flight-type units would comply with the proposed standards for water consumption while reporting idle and washing energy use.
[3] p. 32. Draft Staff Report. This estimate includes idle energy use, washing energy use, electric booster heating, and embedded energy associated with water delivery.
[4] *Ibid*.
[5] p. 33. *Ibid*.
[6] pp. 37-39. *Ibid*.

savings would grow to approximately 400 GWh of electricity, 18 million therms of gas, and 2.6 billion gallons of water after full stock turnover.[7]

The proposed standards are highly cost-effective for California businesses. The average life-cycle cost (LCC) savings for electric-only products[8] range from about $4,300 to nearly $246,000 depending on the product type; simple payback periods (PBPs) range from 0.8 years to 7.3 years with over three-quarters of all product types having simple PBPs under 2.5 years.[9] Gas booster heating products are similarly cost-effective, with LCC savings ranging from about $5,600 to $219,000 depending on the product type;[10] simple PBPs range from 1.0 to 13.2 years. Across all product types, payback periods are meaningfully shorter than the estimated product lifetimes of 12 to 20 years.

We support the proposed scope expansion to gas and steam booster heated products. While ENERGY STAR v3.0 covers only those high-temperature machines that use electric booster heating, the Staff proposal extends coverage to units using gas or steam booster heating.[11] The existing test procedures for stationary-rack, door-type (ASTM F1696-20) and rack conveyor (F1920-20) commercial dishwashers already provide methods for calculating energy use from both booster heating types, making inclusion of gas- and steam-heated units straightforward. The standards proposed for gas- and steam-heated units are also aligned with those for electric heated units, ensuring the standards do not distort the market toward particular booster heating technology.

Commercial dishwasher efficiency is already trending toward ENERGY STAR v3.0. Colorado adopted state standards consistent with v3.0 in 2023, and ENERGY STAR estimates that more than half the market already meets these levels.[12] In our most recent state standards model bill,[13] we recommend that states adopt v3.0, and we anticipate several additional states—including some with existing standards at v2.0—may adopt v3.0 in the coming years. California adoption would help build further momentum in shifting the market to v3.0 for commercial dishwasher efficiency.

The proposed standards could enable additional emissions reductions by facilitating adoption of commercial heat pump water heaters (HPWHs). HPWHs significantly reduce GHG emissions compared to gas-fired equipment—benefits that will only grow as the electric grid decarbonizes. By reducing hot water usage, the proposed standards may allow for installing a smaller HPWH than would otherwise be required, helping to encourage HPWH adoption.

Thank you for considering these comments.

Sincerely,

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[7] p. 1. *Ibid*.

[8] Including both high-temperature and low-temperature electric product types.

[9] p. 47. Draft Staff Report.

[10] p. 48. *Ibid*.

[11] p. 26. *Ibid*.

[12] ENERGY STAR 2023 Unit Shipment Data. https://www.energystar.gov/sites/default/files/2024-09/2023%20Unit%20Shipment%20Data%20Summary%20Report_508.pdf

[13] appliance-standards.org/sites/default/files/2026_ASAP_Model_Bill_Final.docx

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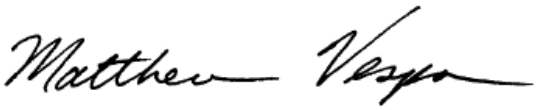

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