

DOCKETED

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MEIKO USA Inc comments on the draft staff report

Additional submitted attachment is included below.

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

July 30, 2026

Docket No. 26-AAER-01 – Commercial Dishwashers
Rulemaking on Appliance Efficiency Regulations for Commercial Dishwashers
MEIKO USA Inc - Comments on Draft Staff Report

Dear CEC Committee Members,

We carefully reviewed the staff report in docket number 26-AAER-01, which was submitted to the docket on March 9, 2026.

MEIKO USA Inc. is an international manufacturer and one of the leading companies producing commercial dishwashing machines. We do offer a wide range of models starting from smaller undercounter machines up to large scale appliances like flight-type conveyor machines.

Based on our findings we would like to share the following comments to support the further regulatory process. The following explanations are based on our market experience and the experience with ENERGY STAR Version 3.0 and might have been missing in the preparations for the planned next regulatory step in California.

- 1. Normative references** – To ensure a well-rounded technical basis for the proposed requirements, we recommend that the CEC also take into account UL 921 (Safety) and NSF/ANSI 3 (Sanitization), in addition to the ASTM standards and the well-established ENERGY STAR Version 3.0 criteria. Together, these standards provide the complete representation of commercial dishwasher design and performance based on the latest state of technique.
- 2. Scope of the planned regulation** – We fully support harmonizing the rulemaking with the ENERGY STAR scope. Based on our field experience we do have to recommend that it should apply only to electrically heated commercial dishwashing machines. These products account for the largest share of the market. Reliable performance data for steam- and gas-heated units remains strongly limited. Tightening the scope will provide a sound technical basis while maintaining consistency with the existing well-established ENERGY STAR program.
- 3. Suitability for high-variation appliances** – The proposed assembly bill will transfer the “recommended and voluntary” ENERGY STAR scheme into a mandatory state regulation, which will force all manufacturers to generate ENERGY STAR data for each product they want to offer to the market. Due to the following aspects, we strongly feel that the verification of a family of machines should be carefully considered by the authorities in the rulemaking process.

The definition of a product model for batch dishwashing machines (e.g. under-counter, hood type) and conveyor dishwashing machines (e.g. rack-type and flight-type) differ. Typically, the number of variances (product models) is significantly higher for conveyor dishwashing machines, especially flight-type models. At the same time the number of units sold of any one specific flight type model is typically very low (even under one per year for some models). Based on our experience, Flight-type dishwashing machines are often the product of customer-specific constraints and technical needs. Product variables within a family typically include band width, band geometry, temperature profile, wash tunnel height, wash and rinse unit lengths, number of

wash and drying sub-units, possible energy recovery systems, as well as the number and length of wash zone spacers. All these variables combine to generate an enormous amount of models. For example, any change affecting the machine length typically results in a new band speed and thereby the dishes washed per hour and the energy/water per dish also changes. At the same time the basic wash concept and the design of the individual elements stay the same within each product family. Testing all these models would cause a significant administrative burden to those manufacturers who are offering very customer specific solutions.

Based on our technical understanding, the compliance of the product families with the proposed legislation could be demonstrated by testing a representative single product model of a defined family. The possibility of generating representative product families based on this representative model testing would reflect the aim of the legislation and keep the burden for the manufacturers balanced. In addition, this approach would enable manufacturers to work in parallel on new customer-specific solutions to provide the latest technology.

- 4. Implementation and impact** – If Assembly Bill 2458 is adopted, leased and rental commercial dishwashing machines should be subject to the same requirements as purchased equipment to establish a same level playing field. Since all these products operate under the same comparable commercial conditions, applying uniform requirements will support fair market competition and help achieve the intended energy savings.
- 5. Administration** – We recommend using the existing and well-established State Appliance Standards Database (SASD) as this is the current basis for reporting. Aligning the planned assembly bill with the current process, including its connection to the ENERGY STAR Product Finder, will significantly streamline compliance, reduce duplicate reporting efforts for manufacturers, and improve consistency between the two reporting systems.

Although we were unfortunately unable to meet the official deadline, we hope that our comments can still be taken into account. Please do not hesitate to contact us if you have any further questions.

MEIKO USA Inc.

Best Regards



Bernhard Cichon
Lead Standardization & Technical Affairs