

**DOCKETED**

<b>Docket Number:</b>	23-AAER-01
<b>Project Title:</b>	Commercial Food Service Equipment (i.e. Commercial Steam Cookers, Commercial Convection Ovens, Commercial Dishwashers, and Commercial Fryer)
<b>TN #:</b>	254435
<b>Document Title:</b>	CMA Dishmachines Comments - RFI and ITSP for Appliance Efficiency Regulations for Commercial Food Service Equipment
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*Comment Received From: CMA Dishmachines  
Submitted On: 2/13/2024  
Docket Number: 23-AAER-01*

**RFI and ITSP for Appliance Efficiency Regulations for Commercial Food Service Equipment**

*Additional submitted attachment is included below.*



February 13, 2024

California Energy Commission  
Docket Unit  
RE: Docket No. 23-AAER-01  
715 P Street  
Sacramento, CA 95814

RE: RFI and ITSP for Appliance Efficiency Regulations for Commercial Food Service Equipment

California Energy Commission,

CMA Dishmachines, manufacturing commercial dishwashers in southern California since 1976, is acutely aware of the increasing costs of electricity and water. Following are our comments regarding proposed efficiency standards for California's future.

Our recommendation is for the California Energy Commission to follow the EPA Energy Star Version 2.0 included and excluded products, qualification criteria and test requirements. This energy star version has proven over the last decade to lower electrical and water usage.

The EPA Energy Star Version 2.0 is currently the standard for the states of Colorado, Massachusetts, Nevada, New Jersey, New York, Oregon, Rhode Island, Vermont, Washington and Washington D.C. through State Appliance Standards Database, SASD, [www.appliancestandards.org](http://www.appliancestandards.org) with additional states to align their standards to SASD in the future.

California's Modernized Appliance Efficiency Database System, MAEDbS, is a similar reporting system to the State Appliance Standards Database.

We believe the costs to California's businesses; manufacturers, sellers and especially the end user facilities, would be lower with the use of one multi state, transparent, user friendly and simplified system like SASD.

Following EPA Energy Star V2.0 will provide Californians access to commercial dishwashers that have proven to save electricity and water, save on labor and are priced affordably.

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California Energy Commission  
Docket Unit  
RE: Docket No. 23-AAER-01  
Page 2

Regarding the marking of commercial dishwashers to ease the burden of regulating on Californians, inspectors and food service establishments, we feel Maryland may have offered a labeling example, see COMAR 14.26.03.11 Labeling, that is of minimal cost impact to manufacturers and easy to identify by inspectors and buyers alike. We believe the label should read "Cal" or similar and be a permanent or semi-permanent mark or label affixed to or near a data plate and on all sales material and product manuals.

Should the commission have questions regarding these remarks please feel free to contact us.

Thanks,

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