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Comment Received From: Jeremy Clark
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ITW-Hobart Comments on Draft Staff Report

Additional submitted attachment is included below.

ITW Food Equipment Group
An Illinois Tool Works Company
701 S. Ridge Avenue
Troy, Ohio 45374-0001
937-332-3000

Food Equipment Group

July 17, 2026

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

Reference: Docket No. 26-AAER-01 – Commercial Dishwashers

Subject: ITW Food Equipment Group Comments on Draft Staff Report

Dear CEC Representative,

Thank you for the opportunity to submit comments on the Draft Staff Report that was submitted to the Docket on March 9, 2026. We have reviewed the Staff Report in Docket Number 26-AAER-01 and have the following comments.

- 1) **Additional Applicable Standards to Commercial Dishwashers** – In addition to the ASTM standards and the ENERGY STAR Version 3.0 scope reviewed by the CEC, we believe the UL safety standard (UL 921) and the NSF sanitation standard (NSF/ANSI 3) would also be valuable references. Reviewing these standards would provide the CEC with a more comprehensive understanding of commercial dishwashers and support the ongoing development of the proposed rulemaking.
- 2) **Scope** – We appreciate that the CEC has preliminarily decided to move forward with the scope of ENERGY STAR V3.0. With that, we would recommend limiting the scope to just electrically-heated dishwashers, as is also done in ENERGY STAR V3.0. The market has been trending toward using Electrically-heated dishwashers in comparison to steam- and gas-heat. They are also the most heavily adopted across the industry. Furthermore, the publicly available performance data for steam- and gas-heated models is limited, making it difficult to establish technically representative efficiency requirements. For these reasons, we believe maintaining consistency with the current ENERGY STAR scope is the most technically appropriate approach at this time.
- 3) **New Technologies** – We would encourage the CEC to leave room for new technologies that do not meet the scope of ENERGY STAR. Manufacturers are constantly developing innovative designs that do not always align with specific model types laid out in the Scope. We believe that allowing flexibility for these types of machines would be beneficial in ensuring that the market and new technologies can continue to grow and evolve.

4) **Leased/Rental Equipment** – Should Assembly Bill 2458 be passed, we would be in support of the CEC’s inclusion of leased/rental equipment in its rulemaking. Whether a dishwasher is purchased outright or provided under a lease/rental agreement, it operates in the same commercial environment and contributes to the overall energy consumption of the market. Applying consistent requirements across both purchased and leased/rental equipment will help ensure a level playing field for manufacturers, prevent unintended market disparities, and maximize the overall energy savings intended by the proposed rulemaking.

5) **Reporting Requirements** – We encourage the CEC to keep its reporting requirements consistent with the existing State Appliance Standards Database (SASD). Using the current SASD framework will help reduce the reporting burden on manufacturers while also maintaining consistency across regulatory databases. Since the SASD is already linked to the ENERGY STAR Product Finder, newly certified models and their associated product information can be imported into the SASD for manufacturer review and acceptance. Building on this existing process will help simplify compliance, reduce duplicate data entry, and improve consistency between the two databases.

Please don’t hesitate to contact us if you have questions regarding this correspondence.

Sincerely,

A handwritten signature in black ink that reads "Jeremy J. Clark". The signature is written in a cursive, flowing style.

Jeremy J. Clark
Electrical Engineer
Warewash Division