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Government Relations

July 22, 2010

DOCKET

09-OII-1

DATE JUL 22 2010

RECD. JUL 22 2010

Re: **Docket number 09-OII-1 ARRA-SEEARP: Notice to Consider Adoption of Changes to California State Energy Efficient Appliance Rebate Program Guidelines**

Whirlpool Corporation appreciates the opportunity to provide input to the California Energy Commission on the Draft proposal for adding dishwashers to the California Cash 4 Appliance program. As a global leader in the appliance industry, we believe we can offer valuable perspective on implementation of this initiative.

While we agree that offering a \$100 rebate on Tier II rated dishwashers would be an excellent addition to the existing Cash 4 Appliance program, we feel that pairing it with a \$50 rebate on Tier I rated dishwashers would strike a more equitable balance between consumer affordability and incentivizing multiple efficiency levels that exceed ENERGY STAR® requirements. This is due to the significantly higher cost for consumers to purchase the majority of Tier II rated dishwashers when compared to the price of many models in Tier I, and the minimal difference in efficiency between these Tiers.

According to industry data reported by TraQline, the Stevenson Company, less than 25 percent of all dishwashers sold in the United States in the last year were priced \$600-\$1999+. The majority of Tier II dishwashers fall in this price range while Tier I dishwashers are by comparison much more abundant in the \$249-\$599 range, which was the price range that made up almost all of the remaining 75 percent of dishwashers sold in USA in the past year.

Moreover, as illustrated below, the energy and water efficiency difference between the Tier I standard-size dishwasher's threshold and the Tier II are 12 kWh a year and 0.75 gallons a cycle. This is smaller than the 17 kWh per year and 0.8 gallon difference from ENERGY STAR to Tier I.

Efficiency level	Minimum Energy Factor	Maximum kWh/year	Maximum gallons/cycle
Standard-size dishwashers ¹			
Federal Standard	0.46	No requirement	No requirement
ENERGY STAR®	No requirement	324	5.8
CEE Tier 1	0.72	307	5.00
CEE Tier 2	0.75	295	4.25

Again, we value the opportunity to provide input to the California Cash 4 Appliance process and look forward to continued collaboration as you move forward in the program's evolution.

Thank you for your consideration!
Sincerely,

Nick Gillespie
Government Relations Senior Specialist