

February 6, 2008

Mrs. Brenda Edwards-Jones
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J
1000 Independence Avenue, SW
Washington, DC 20585-0121

Re: ANOPR for Home Appliance Products
Docket Number EE-2006-STD-0127

Dear Ms. Edwards-Jones:

We are writing to express our support for stronger efficiency standards for commercial clothes washers. We urge the Department of Energy to meet its commitment to issue a Final Rule for these products by March 2009.

Our concerns relate primarily to the water efficiency of commercial clothes washers. Over 25% of all housing units in the US are provided by mobile homes and multifamily buildings of 3 or more units. The laundry needs of these households, as well as many of the millions of Americans living in group quarters, are largely served by family-sized commercial washers – the equipment that is the object of this rulemaking. Commercial washers receive far more use than residential washers, and thus each commercial machine's water consumption is significantly greater than that of a residential washer.

In the decades ahead, the nation's drinking water and wastewater utilities face enormous challenges serving a growing population, meeting stringent new environmental requirements, and replacing aging and inadequate infrastructure – all at the same time. Improving the efficiency of water use is a critically important strategy that will enable utilities to reduce operating costs, better plan capital improvements, and maintain the quality of drinking water supplies and natural waterbodies.

As the Department considers whether to revise the current Federal water use standard for commercial clothes washers, we urge the following –

- Consider and quantify the energy embedded in water and wastewater service when assessing the potential energy savings of new commercial washer standards;
- Develop a standard that reflects the high energy and water efficiencies achieved by the best clothes washer technology, and avoid perpetuating excessive use by establishing a more permissive standard for traditional vertical axis machines;
- Consider the impacts of new standards on water and wastewater utilities, just as the Department now considers the impacts of standards on electric and gas utilities.

Thank you for your attention to these views.

Respectfully submitted,

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