

March 28, 2018

Via E-mail: [The.Secretary@hq.doe.gov](mailto:The.Secretary@hq.doe.gov), [john.cymbalsky@ee.doe.gov](mailto:john.cymbalsky@ee.doe.gov),  
[daniel.cohen@hq.doe.gov](mailto:daniel.cohen@hq.doe.gov), [Daniel.Simmons@ee.doe.gov](mailto:Daniel.Simmons@ee.doe.gov)

The Honorable Secretary Rick Perry  
Office of the Secretary of Energy  
U.S. Department of Energy  
1000 Independence Ave. SW  
Washington, D.C. 20585

**RE: Supplemental Information Regarding CEI's Petition for Rulemaking on a New Product Class of Fast Dishwashers**

We would like to supplement our petition with some information concerning the express cycles that are found on some dishwasher models.

One might think that the presence of these cycles negates the need for the rulemaking that we have proposed. On closer examination, however, this turns out not to be the case, because according to their manufacturers these quick cycles are for lightly soiled dishes rather than normally soiled loads.

For example, the GE model PDT846SSJSS dishwasher has an express cycle that, according to its manual, “will quickly wash lightly soiled dishes.”<sup>1</sup> This is clearly not a replacement for the model’s normal cycle, which “is meant for daily, regular, or typical use to completely wash a full load of normally soiled dishes . . . .”<sup>2</sup>

Similarly, the Frigidaire FGCD2456QF1B has, among other cycles, a Quick Wash cycle which is “for lightly soiled dishes and silverware.”<sup>3</sup>

While these are just two examples, the manuals for other models similarly describe their express cycles as not suitable for normally soiled dishes. None of these models have cycles for everyday use for normally soiled dishes that take only an hour to run (drying time included).

*Consumer Reports* states “The downside of more water- and energy-efficient machines is a cycle time that can approach 3 hours.”<sup>4</sup> Concerning the quick cycles,

---

<sup>1</sup> GE Appliances, Owners Manual for GDF 570-650 Series, GDT 655-695 Series, DDT 595 Series, PDF 820 Series, PDT 825-855 Series, CDT 835-865 Series, Includes GE®, GE Profile™ Series and GE Café™, Series products 7 (accessed on Mar. 28, 2018), <http://products.geappliances.com/MarketingObjectRetrieval/Dispatcher?RequestType=PDF&Name=49-55119-1.PDF>.

<sup>2</sup> *Id.*

<sup>3</sup> Frigidaire, All About the Use & Care of your dishwasher (July 2014), [ftp://ftp.electrolux-na.com/ProdInfo\\_PDF/Kinston/117904940Gen.pdf](ftp://ftp.electrolux-na.com/ProdInfo_PDF/Kinston/117904940Gen.pdf).

<sup>4</sup> Mary H.J. Farrell, 7 Time-Saving Tips for Holiday Cleanup, *Consumer Reports* (November 21, 2017), <https://www.consumerreports.org/kitchen/7-time-saving-tips-for-holiday-cleanup/>.

*Consumer Reports* quotes Larry Ciufu, who oversees its dishwasher tests, that, “If you have lightly soiled dishes, you can use the quick wash cycle.”<sup>5</sup>

In short, the faster cycles found on certain models today do provide some options for consumers. However, because of their limitations they do not provide the degree of consumer choice that this petition seeks.

Sincerely,

Sam Kazman, General Counsel

sam.kazman@cei.org

Devin Watkins, Attorney

devin.watkins@cei.org

D.C. Bar application currently pending

Competitive Enterprise Institute

1310 L Street NW, 7th Floor

Washington, DC 20005

(202) 331-1010

---

<sup>5</sup> *Id.*