



U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

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Consumer Reports Comments on DOE's Rescinding the Amended Water Use
Standards for Residential Dishwashers
(Docket ID: EERE-2025-BT-STD-0023)

Submitted via: www.regulations.gov

Consumer Reports (CR) writes in strong opposition to Department Of Energy's (DOE) proposal to rescind water efficiency standards for residential dishwashers, which would result in significantly increased utility costs for households and consumers. Residential dishwasher standards are critical to ensuring consumers are receiving high quality products that not only result in reduced energy consumption and reduced pollution, but also lower utility bills.

Introduction

Founded in 1936, Consumer Reports (CR) is an independent, nonprofit and nonpartisan organization that works to create a fair and just marketplace for consumers. Known for its rigorous testing and rating of products and vehicles, CR also advocates for laws and corporate practices that are beneficial for consumers. CR is dedicated to amplifying the voices of consumers to promote safety, digital rights, financial fairness, and sustainability. The organization surveys millions of Americans every year, reports extensively on the challenges and opportunities facing today's consumers, and provides ad-free content and tools to 6 million members across the United States.

On behalf of the American consumer, CR supports the adoption of strong, resource efficient appliance standards that improve home energy efficiency, lower monthly energy bills, and limit pollution.

Benefits of Strong Appliance Standards

Appliance standards are an important tool to ensure that the products consumers use will require less water and energy to operate, while maintaining performance and affordability. Since 2000, per household residential energy consumption has declined by about 20%, thanks in large part to continued improvements in energy efficiency. Future reductions in home energy consumption will depend heavily on the continuation of policies such as appliance efficiency standards.

For consumers, benefits from appliance standards can be seen in the form of reduced utility bills. Today, the average household sees utilities account for a little more than 5% of their annual expenditures, adding up to about \$3,400 annually.¹ However, for more than a quarter of Americans facing a high energy burden, this number is closer to 15% of their household expenditures.² Energy efficiency standards, including appliance standards, can provide consumers an additional tool to reduce this spending.

Energy efficiency standards are cost effective. American consumers saved over \$100b on their energy bills in 2024 alone as a result of standards that have been implemented, averaging \$500

¹ Doxo, The Bill Pay Economy - U.S. Utilities Market Size and Household Spend, 2024.
https://www.doxo.com/wp-content/uploads/2024/12/doxoINSIGHTS-Utilities_Market_Size_and_Household_Spend_Report_2024_FINAL.pdf

² American Council for an Energy-Efficient Economy, Data Update: City Energy Burdens, 2024.
<https://www.aceee.org/energy-burden>

in energy and water savings per average household.³ Further, standards implemented from 2021 – 2024 will together reduce utility bills by over \$1 trillion over 30 years and save the average family at least \$100 a year through lower utility bills.⁴

By adopting the proposals to eliminate this slate of appliance standards, households and businesses would see utility costs increase by more than \$54 billion. The DOE recently estimated that eliminating the standards will save American taxpayers up to \$11 billion over the span of the rule, while in reality this move would leave consumers and businesses with an additional cost burden of \$43 billion over the same period.⁵ This figure is calculated leveraging DOE's own appliance standards cost savings estimates, revealing a concerning contradiction in narrative and public policy from the DOE.

Energy efficiency doesn't just directly help consumers, it also provides positive benefits to the entire energy ecosystem. By reducing the amount of energy required to provide the same end services, it frees up energy to be used for new and growing load sources like new businesses and households, electric vehicles, data centers, and AI. Studies consistently show that energy efficiency is far more cost effective than adding new power plants to service additional loads.⁶ Because energy efficiency almost always costs less than expanding generation, it also puts downward pressure on electricity rates, helping to keep costs down for all consumers, even those that don't choose more efficient appliances.

On the flip side, If efficiency standards are weakened or eliminated, a flood of inefficient appliances could add to the strain on energy systems already struggling with growing energy demands. Additional energy demand from more inefficient appliances is likely to put pressure on energy prices, driving further inflation and harming all consumers, not just those that chose less efficient appliances.

Consumer Support for Strong Appliance Standards

Consumers across the country understand the benefits of lower utility costs and more money in their pockets. In a March 2025 CR nationally representative survey of 2,291 U.S. adults, Americans expressed overwhelming support for energy efficiency standards. Eighty-seven percent of Americans—including 94% of Democrats and 82% of Republicans—agree that home

³ U.S. Department of Energy, Appliance and Equipment Standards Program, <https://www.energy.gov/eere/buildings/appliance-and-equipment-standards-program>

⁴ U.S. Department of Energy, Appliance Standards Face Sheet, 2025. <https://www.energy.gov/sites/default/files/2025-03/Appliance%20Standards%20Fact%20Sheet-02.pdf>

⁵ American Council for an Energy-Efficient Economy, Proposed Rollbacks of Efficiency Standards Would Cost Consumers \$43 Billion, May 2025.

<https://appliance-standards.org/sites/default/files/Rollbacks-would-cost-consumers-43-billion.pdf>

⁶ American Council for an Energy-Efficient Economy, As Utilities Plan New Power Plants, Analysis Shows Saving Energy Is a Low-Cost Alternative, 2021.

<https://www.aceee.org/blog-post/2021/06/utilities-plan-new-power-plants-analysis-shows-saving-energy-low-cost-alternative>

appliances for sale in the U.S. should be required to meet a minimum level of energy efficiency.⁷ Similarly, when asked what would most encourage them to buy an energy-efficient appliance, more than six in ten Americans say that saving money on energy bills (63%) would do so.⁸

A petition signed by over 22,000 Americans urges the DOE to withdraw all proposals that roll back appliance efficiency standards, which have delivered enormous benefits to American households.⁹ Rather than weakening existing rules, consumers are calling on the Department to work collaboratively with the public and advocacy groups to strengthen these standards and deliver even greater savings.

Benefits of Residential Dishwasher Appliance Standards

Reverting to the statutory water efficiency standards would increase costs for the nearly 9 million consumers who purchase dishwashers annually.¹⁰ According to DOE's May 2012 final rule, the current standards save buyers of standard dishwashers an average of \$62 in utility bills over the product's lifetime compared to models meeting only the statutory minimum,¹¹ with net savings of \$28 after accounting for upfront costs.¹² The amended standards finalized in April 2024, set to take effect in April 2027, are projected to save consumers an additional \$49 in utility costs¹³ and provide \$23 in net savings.¹⁴ Together, these standards deliver over \$50 in lifetime savings per dishwasher relative to the statutory baseline.

Beyond cost savings, DOE's analyses show that reverting to the statutory standards would significantly increase dishwasher water consumption by 323 gallons per year compared to current standards,¹⁵ and by 658 gallons compared to the amended 2024 standards.¹⁶ Water savings account for a meaningful share of total consumer savings, representing 25% of lifetime operating cost reductions under the 2012 rule¹⁷ and 32% under the 2024 update.¹⁸ Reversing these standards would not only increase household utility bills but also lead to higher water use, undermining both consumer savings and broader water conservation goals.

⁷ Consumer Reports, American Experiences Survey - March 2025 Results, 2025.
https://article.images.consumerreports.org/image/upload/v1744212505/prod/content/dam/surveys/Consumer_Reports_AES_March_2025.pdf

⁸ *ibid.*

⁹ Consumer Reports, Petition to Department of Energy on Appliance Efficiency Standards, July 2025.
https://advocacy-wp-prod.crinfra.net/wp-content/uploads/2025/07/Appliance_efficiency_standards.CR_7.15.26.pdf

¹⁰ April 2024 Final Rule Technical Support Document (TSD).
www.regulations.gov/document/EERE-2019-BT-STD-0039-0061

¹¹ May 2012 Final Rule TSD.

¹² *ibid.*

¹³ 89 Fed. Reg. 31452 (April 24, 2024).

¹⁴ *ibid.*

¹⁵ May 2012 Final Rule TSD. www.regulations.gov/document/EERE-2011-BT-STD-0060-0007.

¹⁶ *ibid.*

¹⁷ 2012 National Impacts Analysis (NIA) spreadsheet.
www.regulations.gov/document/EERE-2011-BT-STD-0060-0010.

¹⁸ 2024 NIA spreadsheet. www.regulations.gov/document/EERE-2019-BT-STD-0039-0064.

Conclusion

CR is disappointed in the DOE's attempts to weaken appliance efficiency standards, which provide critical savings for consumers and businesses alike. These proposals would needlessly increase costs for consumers and businesses, strain the electric grid and water resources, undermine manufacturers' investments in meeting the current standards, and increase household pollution and water waste. We therefore respectfully urge you to withdraw these proposals and continue to enforce existing appliance standards.

Respectfully submitted,

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