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ATTORNEY GENERAL RAOUL CHALLENGES RULE UNDERMINING ENERGY EFFICIENCY STANDARDS FOR DISHWASHERS

Chicago — Attorney General Kwame Raoul today joined a coalition of 15 attorneys general and New York City [in filing a lawsuit](#) challenging the Department of Energy's (DOE) final rule undermining current energy efficiency standards for residential dishwashers. The rule unjustifiably exempts a class of dishwashers from energy efficiency standards by creating a new, unnecessary category of dishwashers defined only by shorter cycle times.

"The dishwashers permitted by this rule will cost consumers money while wasting electricity and water," said Raoul. "I am committed to fighting against the rollbacks of federal energy efficiency standards that appease industry interests at the expense of the environment."

The Energy Policy and Conservation Act directs the DOE to establish energy efficiency standards covering most major household products, including dishwashers. The DOE's long-standing energy efficiency program has resulted in substantial economic and environmental benefits, with more than \$2 trillion in projected consumer savings and 2.6 billion tons of avoided carbon dioxide emissions by 2030. The Energy Policy Conservation Act's anti-backsliding provision prohibits the DOE from "prescrib[ing] any amended standard which increases the maximum allowable energy use . . . of a covered product."

In October 2020, the DOE moved to finalize its proposal to create a new category of dishwashers defined only by shorter cycle times. By creating a new product class, the DOE claims that short-cycle dishwashers are not subject to existing energy efficiency standards for residential dishwashers.

In the lawsuit, Raoul and the coalition argue that the final rule:

- Violates Energy Policy Conservation Act's anti-backsliding provision.
- Fails to comply with National Environmental Policy Act by invoking an inapplicable categorical exclusion to avoid conducting an environmental review.
- Is arbitrary and capricious under the Administrative Procedure Act.

Joining Raoul in filing the lawsuit are the attorneys general of California, Connecticut, the District of Columbia, Massachusetts, Maine, Michigan, Minnesota, Nevada, New Jersey, New Mexico, New York, Oregon, Vermont and Washington, as well as New York City.