

ENERGY STAR® Commercial Griddle Online Stakeholder Meeting October 7, 2008

Meeting Notes

Commercial griddle manufacturers and other industry stakeholders participated in an online meeting hosted by the U.S. Environmental Protection Agency (EPA) on October 7, 2008. The purpose of the meeting was to introduce stakeholders to the ENERGY STAR program and discuss the Draft 1 ENERGY STAR Specification for Commercial Griddles that was distributed on September 8, 2008. The Attendee List and meeting presentation are available on the ENERGY STAR Web site at: www.energystar.gov/productdevelopment. Click on the "New Specifications in Development" link.

Below is a summary of the slides presented by Rachel Schmeltz, ENERGY STAR Program Manager, and the discussion that followed. Written comments on the Draft 1 document are due to Rebecca Duff, ICF International, at rduff@icfi.com by October 17, 2008.

Overview of ENERGY STAR and the Specification Development Process

Ms. Schmeltz provided an overview of the ENERGY STAR program and touched on each of the Guiding Principles that serve as a reference for EPA when developing an ENERGY STAR specification. These include:

- Significant energy savings will be realized on a national basis.
- Product energy consumption and performance can be measured and verified with testing.
- Product performance will be maintained or enhanced.
- Purchasers of the product will recover any cost difference within a reasonable time period.
- Specifications do not unjustly favor any one technology.
- Labeling will effectively differentiate products to purchasers.

Ms. Schmeltz then guided attendees through the steps of the ENERGY STAR specification development process and discussed the following important elements that make this process successful:

- Consistency – additional steps have been added to the process to allow for more consistent and frequent stakeholder involvement.
- Transparency – all EPA documents and comments are posted to the ENERGY STAR Web site.
- Inclusiveness – in addition to manufacturers, EPA engages other industry stakeholders such as trade associations, utilities, retailers, and end users.
- Responsiveness – EPA acknowledges receipt of all comments, responding promptly to questions and/or requests for meetings and conference calls.
- Clarity – additional discussion is provided in each draft specification discussing EPA's approach and justification for any changes.

Draft 1 ENERGY STAR Specification Requirements

Ms. Schmeltz first provided an overview of the standard ENERGY STAR Partner Commitments and expanded on the following key requirements:

- Annual submission of qualified product data;
- Product labeling requirements; and
- Annual submission of ENERGY STAR shipments.

She then presented the key elements of the Eligibility Criteria (i.e., technical specification) including: eligible product types; ASTM test procedures for measuring idle and cooking energy efficiency; idle and cooking energy efficiency levels; and calculations for normalizing idle energy rate based on square footage of the cooking surface. Ms. Schmeltz shared the potential energy and dollar savings from the proposed ENERGY STAR levels and presented a simple payback analysis for 36-inch thermostatically controlled gas griddles, which was estimated to be less than one year.

Stakeholder Discussion Notes

Participants were offered the opportunity to ask questions and make comments on the information presented during the meeting and the Draft 1 ENERGY STAR Specification for Commercial Griddles. The resulting discussion focused on the following few issues: 1) ENERGY STAR program requirement to submit annual unit shipment data to EPA; 2) EPA's approach to double-sided griddles; and 3) ENERGY STAR testing requirements.

ENERGY STAR Program Requirements to Submit Annual Unit Shipment Data

There was some concern regarding the annual requirement to share sales/shipment data with EPA due to the competitive nature of this industry.

- **ENERGY STAR Response:** EPA allows manufacturers to submit data through a third party organization that can then provide an aggregate number representing all partners. EPA does not see the individual manufacturer shipment numbers. Our consultant collects the information and provides an aggregate summary of the data per product category to EPA, and this summary is what is published on the Web site. EPA has been collecting shipment data for 5 years and has not had any problems with data security.

One participant commented that it would be more accurate to collect information on ENERGY STAR equipment purchases, as opposed to shipments.

- **ENERGY STAR Response:** There are instances where EPA has been able to obtain sales data, but only in cases where the ENERGY STAR product is being sold by an ENERGY STAR partner (e.g., retailers and appliances, such as Home Depot). For commercial foodservice equipment, EPA does not partner with retailers or end users so obtaining information on purchases would be very difficult. We understand the limitations of using shipment data; however, for commercial foodservice equipment our current approach has been quite effective.

EPA's Approach to Double-Sided Griddles

With regard to the proposed approach for measuring double-sided griddle performance, which assumes a full top platen and bases normalization on the bottom base griddle, attendees pointed out that several models are sold with top platens that are smaller in size (i.e., partial coverage). According to the manufacturers on the call, many double-sided griddles are sold as a griddle platform offering several options regarding the top platen size.

There was concern that even if EPA requires the models to be tested with a platen that matched the base size, there might be some confusion and potentially some gaming with partial units.

- **ENERGY STAR Response:** This needs to be researched further. We would like to learn more about partial units and collect more data on them.

One participant stated that EPA should include double-sided units in the specification now and address partial griddle designs later after additional discussions and data review. This issue is very complicated and may take some time to come to a conclusion on how to address these product types. In addition, it might be difficult to track partial double-sided units versus standard double-sided that can earn the ENERGY STAR, especially in those cases where different options are offered.

- ENERGY STAR Response: Overall, the data set could use some more points for double-sided griddles. Also, EPA is interested in better understanding whether there is a functionality difference between single- and double-sided griddles.

One stakeholder responded that from the 10,000 ft view they have the same functionality but looking closer they are very different animals. For example, double-sided griddles cook food faster because two sides are working instead of just one. An end user is not going to compare single and double-sided griddles when making a purchasing decision.

Another participant stated that the approach EPA is proposing regarding gas bottom/electric top griddles is a bit confusing. Why is EPA taking this approach?

- ENERGY STAR Response: If we allowed the top platen to meet the electric levels and then the bottom to meet the gas levels the total energy allowed for this type of double sided griddle would be too high and wouldn't be representative of the true efficiency gained by cooking with both sides and idling with the top platen down. Therefore, the proposed approach was an attempt to determine a total combined efficiency of the unit. The dataset for these types of double-sided griddles is very small. For EPA to set a separate specification we will need more data points.

What is the adequate number of data points that EPA needs to create specifications?

- ENERGY STAR Response: EPA is comfortable moving forward with the number of data points currently used in the analysis (i.e., 29 gas, 9 electric) but we would also like to get more data to confirm proposed levels, especially for electric units and double-sided designs.

ENERGY STAR Testing Requirements

Does EPA require third party testing under ENERGY STAR?

- ENERGY STAR Response: As long as the manufacturer follows the test procedure required in the specification they may self-test under the ENERGY STAR program. However, EPA has the right to follow up on questions raised by other manufacturers regarding performance claims. If it is determined that a manufacturer is making a false performance claim, then EPA will take corrective action and that manufacturer could lose its ENERGY STAR partnership status.

Several manufacturers shared that they would be more comfortable with a third party testing requirement. There is a lack of trust in manufacturer claims in this industry and not enough time or resources for manufacturers themselves to test and challenges these claims.

However, one stakeholder brought up the cost and lab accessibility barriers. Manufacturers will be able to test, qualify, and get ENERGY STAR models to market much more quickly if they do the testing themselves.

- ENERGY STAR Response: EPA would like to have additional discussions regarding third party testing. There are a few ENERGY STAR product specifications that require third party testing so EPA is willing to discuss further.

One stakeholder asked which third party facilities currently provide testing services.

- ENERGY STAR Response: Currently we know of the following labs that do this testing: PG&E's Food Service Technology Center (FSTC); Southern California Edison; and Southern California Gas. However, technically any lab could perform the test if they follow the correct ASTM test procedure.

Representatives from PG&E's Food Service Technology Center offered to come out to manufacturer facilities and assist them with test set-up, etc. Currently, there is a long waiting list for testing at FSTC.

One manufacturer asked if changes are made to the products that impact energy efficiency performance would manufacturers be required to re-test for ENERGY STAR qualification. How will this be policed? In this situation, model numbers do not change (even though key components might change).

- ENERGY STAR Response: If changes made to the model impact energy efficiency performance then yes, the manufacturer must retest and resubmit results to EPA to remain qualified. EPA is in the

process of launching a more robust quality assurance testing effort to check ENERGY STAR product performance and manufacturer claims in the marketplace.

A suggestion was made that EPA review the approach used by the Canadian Standards Association (CSA) and consider a similar approach to testing/policing under ENERGY STAR.

- ENERGY STAR Response: EPA will look at CSA's approach. Perhaps another alternative could be to ask manufacturers to report information on key components so that changes could be easily reviewed/compared against claims. EPA could collect this information on the qualifying product information form that is required for ENERGY STAR qualification.

One participant further stated that EPA will also need to be very clear in the specification regarding what can and cannot be changed in the equipment to remain qualified (or required to be resubmitted).

Conclusion

Ms. Schmeltz concluded the meeting by presenting a proposed date by which the specification could become effective (i.e., February 2009 in conjunction with the NAFEM Show) but also noted that NAFEM could be used for an in-person stakeholder meeting instead, resulting in a later effective date (i.e., May 2009 in conjunction with the National Restaurant Association Show) . Participants were then encouraged to provide written comments to EPA by October 17, 2008.