

Requested Comments by EPA – Per Meeting Notes from 2/4/09 NAFEM Energy Star Meeting

We, as an industry, applaud EPA's work in starting an Energy Star program for Commercial Griddles since they are a major energy user when it comes to QSR's. We also know that a first time program is never perfect and will need to be tweaked over time, but what you have so far is a very good starting point.

Taylor understands that the number of data points available to EPA to set energy consumption rates is limited but we feel that you have enough data points to determine energy levels which would qualify Commercial Griddles. We must move forward with the Energy Star program because that is the only way more manufacturers will have an incentive to get their units tested. This will give EPA a great number of data points in the future if and when EPA looks at the current requirements to see if they should be raised. That being the case, Taylor would like to see the Energy Star program move forward with the Single-Sided and Double-Sided Commercial Griddles.

Taylor has some comments which we would like to present to EPA when it comes to the qualification of Double-Sided Griddles that can be sold with full and partial platen(s):

If a manufacturer wants to offer an energy star model in their line of equipment with or without platens that cover $\geq 80\%$, then that model needs to meet the current specifications set for a single-sided and double-sided griddle.

A Griddle that has an optional Platen that does not meet the $\geq 80\%$ should not be eligible for the energy star program since the current ASTM test method does not cover this scenario. We as manufacturers should be asking the ASTM F26 committee to develop a test method that includes partial platen coverage so data can be presented to EPA for these types of models. I know it takes a long time to develop a test method, but with the Energy Star Program as a goal this would push manufacturer's to get a test method developed and griddles tested.

If a manufacturer offers a Double-Sided Griddle that has $\leq 80\%$ platen(s) coverage but meets the current requirements set forth by EPA for double-sided griddles, these griddles should be eligible for the Energy Star. If that same model is offered in optional platen configurations (i.e. model is designed with two platens but can be manufactured with only one) then that same model must meet both the single-sided and double-sided energy star requirements. If this model only meets one of the two requirements, then these options will not be available on this model and the manufacturer should give these other configurations a new model designation since these other configurations do not meet EPA energy star requirements.

As for phasing in energy levels (i.e. lowering the current limits and setting a phase approach to increase limits over time) Taylor would recommend not to do that at this time since it would confuse people in the QSR industry. Since this Griddle program will be new to the QSR Industry, it's our recommendation to keep the program as simple as possible.

I hope these comments will be considered when EPA looks at Energy Star Draft 2 specification. Taylor looks forward to working with EPA and its development of an Energy Star program for Commercial Griddles.

Deb Sweger and Rex Brandt

Taylor Company