



ENERGY STAR® Program Requirements for Commercial Griddles

Draft 2: Partner Commitments

12

13 **Commitment**

14 The following are the terms of the ENERGY STAR Partnership Agreement as it pertains to the
15 manufacturing of ENERGY STAR qualified commercial griddles. The ENERGY STAR Partner must
16 adhere to the following program requirements:

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- 18 • comply with current ENERGY STAR Eligibility Criteria, defining the performance criteria that must be
19 met for use of the ENERGY STAR certification mark on commercial griddles and specifying the testing
20 criteria for commercial griddles. EPA may, at its discretion, conduct tests on products that are referred
21 to as ENERGY STAR qualified. These products may be obtained on the open market, or voluntarily
22 supplied by Partner at EPA's request;
- 23

24 **Note:** EPA received several questions regarding data quality and compliance. One stakeholder asked
25 how EPA will ensure that units shipped in the field actually meet the specification. EPA has a
26 comprehensive program in place for assuring that products displaying the label meet the relevant
27 performance requirements. The Agency has been conducting verification testing on a range of products
28 for sometime and is exploring how best to address commercial food service products in that context.
29 Other important elements of EPA's quality assurance program includes a formal partnership agreement,
30 by which the manufacturer certifies that products sold as ENERGY STAR qualified meet the relevant
31 ENERGY STAR criteria, formal test procedures, and the review of submitted qualification data. In
32 egregious cases, EPA reserves the right to terminate the partnership.

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34 In addition, one stakeholder asked what the consequence would be if a manufacturer or equipment supply
35 chain partner misuses the ENERGY STAR label. In the case of a logo violation, the manufacturer in
36 question is directed to stop using the logo in association with the non-qualifying product. Depending on
37 the extent of the logo violation, the manufacturer is asked to submit a corrective action plan, which in
38 some instances requires them to remove or cover labels on products already in distribution.

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- 41 • comply with current ENERGY STAR Identity Guidelines, describing how the ENERGY STAR marks
42 and name may be used. Partner is responsible for adhering to these guidelines and for ensuring that
43 its authorized representatives, such as advertising agencies, dealers, and distributors, are also in
44 compliance;
- 45
- 46 • qualify at least one ENERGY STAR commercial griddle within one year of activating the commercial
47 griddles' portion of the agreement. When Partner qualifies the product, it must meet the specification
48 (e.g., Tier 1 or 2) in effect at that time;
- 49
- 50 • Provide clear and consistent labeling of ENERGY STAR qualified commercial griddles. The ENERGY
51 STAR mark must be clearly displayed on the front of the product, in product literature (i.e., user
52 manuals, spec sheets, etc.), and on the manufacturer's Internet site where information about ENERGY
53 STAR qualified models is displayed;
- 54
- 55 • provide to EPA, on an annual basis, an updated list of ENERGY STAR qualifying commercial griddle
56 models. Once the Partner submits its first list of ENERGY STAR qualified commercial griddles, the
57 Partner will be listed as an ENERGY STAR Partner. Partner must provide annual updates in order to
58 remain on the list of participating product manufacturers;
- 59
- 60 • provide to EPA, on an annual basis, unit shipment data or other market indicators to assist in

61 determining the market penetration of ENERGY STAR. Specifically, Partner must submit the total
62 number of ENERGY STAR qualified commercial griddles shipped (in units by model) or an equivalent
63 measurement as agreed to in advance by EPA and Partner. Partner is also encouraged to provide
64 ENERGY STAR qualified unit shipment data segmented by meaningful product characteristics (e.g.,
65 capacity, size, speed, or other as relevant), total unit shipments for each model in its product line, and
66 percent of total unit shipments that qualify as ENERGY STAR. The data for each calendar year should
67 be submitted to EPA, preferably in electronic format, no later than the following March and may be
68 provided directly from the Partner or through a third party. The data will be used by EPA only for
69 program evaluation purposes and will be closely controlled. If requested under the Freedom of
70 Information Act (FOIA), EPA will argue that the data is exempt. Any information used will be masked
71 by EPA so as to protect the confidentiality of the Partner;

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73 **Note:** One stakeholder expressed concerns regarding the proprietary nature of unit shipment data and
74 suggested that reporting be voluntary and collected from end users. Shipment data is collected from
75 ENERGY STAR partners across more than 60 product categories. EPA allows manufacturers to submit
76 data through a third party organization that can then provide an aggregate number representing all
77 partners. All data is submitted to an EPA consultant who provides aggregate data to EPA. This summary
78 is then published on the ENERGY STAR Web site at www.energystar.gov/usd.

79
80 For commercial foodservice equipment, EPA does not partner with distributors or end users. Therefore,
81 obtaining information on purchases would be very difficult. While EPA understands the limitations of using
82 unit shipment data the current approach has been quite effective for estimating total market penetration for
83 commercial foodservice equipment.

- 84
85 • notify EPA of a change in the designated responsible party or contacts for commercial griddles within
86 30 days.

87 88 **Performance for Special Distinction**

89 In order to receive additional recognition and/or support from EPA for its efforts within the
90 Partnership, the ENERGY STAR Partner may consider the following voluntary measures and should keep
91 EPA informed on the progress of these efforts:

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93 • consider energy efficiency improvements in company facilities and pursue the ENERGY STAR mark for
94 buildings;
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96 • purchase ENERGY STAR qualified products. Revise the company purchasing or procurement
97 specifications to include ENERGY STAR. Provide procurement officials' contact information to EPA for
98 periodic updates and coordination. Circulate general ENERGY STAR qualified product information to
99 employees for use when purchasing products for their homes;
- 100
101 • ensure the power management feature is enabled on all ENERGY STAR qualified monitors in use in
102 company facilities, particularly upon installation and after service is performed;
- 103
104 • provide general information about the ENERGY STAR program to employees whose jobs are relevant
105 to the development, marketing, sales, and service of current ENERGY STAR qualified product models;
- 106
107 • feature the ENERGY STAR mark(s) on Partner Web site and in other promotional materials. If
108 information concerning ENERGY STAR is provided on the Partner Web site as specified by the
109 ENERGY STAR Web Linking Policy (this document can be found in the Partner Resources section on
110 the ENERGY STAR Web site at www.energystar.gov), EPA may provide links where appropriate to the
111 Partner Web site;
- 112
113 • provide a simple plan to EPA outlining specific measures Partner plans to undertake beyond the
114 program requirements listed above. By doing so, EPA may be able to coordinate, communicate,
115 and/or promote Partner's activities, provide an EPA representative, or include news about the event in
116 the ENERGY STAR newsletter, on the ENERGY STAR Web pages, etc. The plan may be as simple

117 as providing a list of planned activities or planned milestones that Partner would like EPA to be aware
118 of. For example, activities may include: (1) increase the availability of ENERGY STAR labeled
119 products by converting the entire product line within two years to meet ENERGY STAR guidelines; (2)
120 demonstrate the economic and environmental benefits of energy efficiency through special in-store
121 displays twice a year; (3) provide information to users (via the Web site and user's manual) about
122 energy-saving features and operating characteristics of ENERGY STAR qualified products, and (4)
123 build awareness of the ENERGY STAR Partnership and brand identity by collaborating with EPA on
124 one print advertorial and one live press event;

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- 126 • provide quarterly, written updates to EPA as to the efforts undertaken by Partner to increase availability
127 of ENERGY STAR qualified products, and to promote awareness of ENERGY STAR and its message.
128
- 129 • join EPA's SmartWay Transport Partnership to improve the environmental performance of the
130 company's shipping operations. SmartWay Transport works with freight carriers, shippers, and other
131 stakeholders in the goods movement industry to reduce fuel consumption, greenhouse gases, and air
132 pollution. For more information on SmartWay, visit www.epa.gov/smartway.
133
- 134 • join EPA's Climate Leaders Partnership to inventory and reduce greenhouse gas emissions. Through
135 participation companies create a credible record of their accomplishments and receive EPA recognition
136 as corporate environmental leaders. For more information on Climate Leaders, visit
137 www.epa.gov/climateleaders.
138
- 139 • join EPA's Green Power partnership. EPA's Green Power Partnership encourages organizations to buy
140 green power as a way to reduce the environmental impacts associated with traditional fossil fuel-based
141 electricity use. The partnership includes a diverse set of organizations including Fortune 500
142 companies, small and medium businesses, government institutions as well as a growing number of
143 colleges and universities, visit <http://www.epa.gov/grnpower>.



ENERGY STAR® Program Requirements for Commercial Griddles

Draft 2: Eligibility Criteria

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Below is the **DRAFT 2** Version 1.0 product specification for ENERGY STAR qualified commercial griddles. A product must meet all of the identified criteria if it is to earn the ENERGY STAR.

1) Definitions: Below are the definitions of the relevant terms in this document.

- A. **Single-Sided Commercial Griddle:** A commercial appliance designed for cooking food in oil or its own juices by direct contact with either a flat, smooth, hot surface (i.e., flat, polished steel plate) or a hot channeled cooking surface (i.e., polished steel ½-inch grooved plate) where plate temperature is thermostatically controlled.
- B. **Double-Sided Commercial Griddle:** A commercial appliance designed for cooking food in oil or its own juices by direct contact with two hot surfaces where temperature is thermostatically controlled. A double-sided griddle has hinged upper griddle plates (platens) that swing down over the food, thereby cooking the food from both sides at once.
- C. **Fry-Top Range:** A multi-purpose appliance used for surface cooking by direct contact with a heated plate, and may also function as a device for roasting, broiling, grilling or any combination of these methods. A fry-top range may have an oven located beneath the cooktop or shelving or may be mounted on top of a refrigerated base.
- D. **Manual Control:** Infinite-control knob to regulate the input of each burner or element. Manual controls are calibrated in terms of the percentage of input, as the heater does not generally sense the temperature of the cooking surface.
- E. **Thermostatic Control:** Simple temperature-feedback control that regulates the heaters based on griddle plate temperature. Thermostatic controls have the potential to sense the presence of cooking loads and offer better response and faster recovery when a load of fresh product is placed on the cooking surface.
- F. **Cooking Energy Efficiency:** The ratio of energy absorbed by the food product to the total energy supplied to the griddle during cooking.
- G. **Idle Energy Rate:** The rate of griddle energy consumption while it is maintaining or holding at a stabilized operating condition or temperature. Also called standby energy rate. For the purposes of this specification the idle rate is normalized based on the area of the (bottom) cooking surface.

2) Qualifying Products: A commercial griddle must meet definitions provided in Section 1A and 1B above to be eligible for ENERGY STAR qualification under this specification. Griddles that are manually controlled and fry-top ranges, as defined in Section 1 above, are not eligible for ENERGY STAR under this Version 1.0 specification.

3) Efficiency Requirements for Qualifying Products: Commercial griddles must meet all the requirements provided below to qualify as ENERGY STAR.

Table 1: Energy Efficiency Requirements for Single and Double Sided Commercial Gas Griddles	
Cooking Energy Efficiency*	≥ 38%
Normalized Idle Energy Rate	≤ 2,650 Btu/h per ft ²

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Table 2: Energy Efficiency Requirements for Single and Double Sided Commercial Electric Griddles	
Cooking Energy Efficiency*	> 70%
Normalized Idle Energy Rate	≤ 320 watts/ft ²

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*Note: Measured at heavy-load conditions per ASTM F1275 and F1605. Performance results must be reported using rounding to the nearest whole number.

The formulae for normalizing the idle energy rates for gas and electric griddles are as follows:

$$q_{g-idle,n} = \frac{q_{gas} (Btu / h)}{A(ft^2)}, q_{e-idle,n} = \frac{1000 \times q_{elec} (kW)}{A(ft^2)}$$

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Where

- q_{g-idle,n} = normalized gas griddle idle energy rate, Btu/h/ft²,
- q_{gas} = gas energy rate during idle , Btu/h,
- q_{e-idle,n} = normalized electric griddle idle energy rate, W/ft²,
- q_{elec} = electric energy rate during idle , kW,
- A = area of the bottom cooking surface (ft²) measured splashguard to splashguard and splashguard to grease trough

213 **Double-sided griddles that include an electric top plate and gas bottom plate** must meet the
214 cooking energy efficiency and idle energy rate for gas griddles in Table 1, above. Manufacturers should
215 use the formula provided below to determine normalized idle energy rate in Btu/h per ft².
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$$q_{ds-idle,n} = \frac{q_{gas} (Btu / h) + 3413 \times q_{elec} (kW)}{A(ft^2)}$$

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Where

- q_{ds-idle,n} = normalized gas griddle idle energy rate, Btu/h/ft²,
- q_{gas} = gas energy rate during idle , Btu/h,
- q_{elec} = electric energy rate during idle , kW,
- A = area of the bottom cooking surface (ft²) measured splashguard to splashguard and splashguard to grease trough

228 **Note:** Based on discussions during the February stakeholder meeting, EPA has slightly modified the idle
229 energy rate for gas griddles (i.e., from 2,600 to 2,650 Btu/h per ft²) to better represent the natural break
230 between high and standard efficiency demonstrated by the EPA data set and to ensure a wider selection
231 of qualifying single-sided griddles.
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233 In addition, EPA has clarified that the griddle bottom cooking surface (Area, ft²) should be measured
234 splashguard to splashguard and splashguard to grease trough.
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236 **Production Capacity:** Some stakeholders believe that production capacity should be considered when
237 developing ENERGY STAR requirements for idle energy rate. As explained during the February meeting,
238 production capacity is calculated from cooking energy efficiency using the ASTM test method.
239 Furthermore, idle energy rate should represent the energy used while the griddle is *not* cooking (i.e.,
240 absence of a cook load). However, in response to these concerns EPA revisited the current data set and
241 plotted production capacity against idle energy rate to determine if there is an observable trend between
242 production rate and idle energy rate. Based on the EPA data there does not appear to be any direct
243 relationship between high production rate and high idle energy rate. In fact, EPA identified several high
244 production units that also meet the proposed idle energy rates.
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248 **Note continued:**

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250 Therefore, EPA is continuing to approach idle energy rate using the normalized approach that does take
251 into consideration griddle size. Based on data and testing, EPA has been able to identify a link between
252 griddle surface area and idle energy rate. The production capacity vs. idle energy rate plot is available on
253 the ENERGY STAR Web site at www.energystar.gov/productdevelopment (Click on New Specifications in
254 Development).

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256 **Electric Idle Energy Rate:** As discussed during the February stakeholder meeting, the EPA data set for
257 electric griddles is quite limited and manufacturers claim that it is representative of *only* top performers.
258 Stakeholders were concerned that the proposed Draft 1 levels would actually represent significantly less
259 than EPA's desired 25% target because standard efficiency units are not well represented. In order to set
260 a specification that represents the top 25% of performers in the marketplace more data is needed on
261 standard efficiency equipment. As part of the comment process, stakeholders are encouraged to provide
262 performance data on **standard efficiency electric griddles** for purposes of determining an appropriate
263 idle energy rate that supports this guiding principle.

264
265 The possibility of two phases of requirements for electric griddles was also discussed during the
266 stakeholder meeting. In this scenario, the first phase would become effective on May 1, requiring less
267 stringent levels initially, and the second phase would go into effect 1-2 years in the future increasing
268 ENERGY STAR levels to EPA's initial proposal of 70% and 320 Watts/ft². EPA may consider this
269 approach if additional information can be provided that supports an initial lower idle energy rate.

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271 EPA also received a stakeholder proposal for calculating electric idle energy rate based on the proposed
272 gas idle energy rate. Provided below is the proposed approach using a 3' griddle as an example:

273
274 3,412 Btu = 1kWh

275 Proposed gas idle energy rate = 15,600 Btu = 4.57 kWh

276 Proposed gas cooking energy efficiency = 38%

277 Proposed electric cooking energy efficiency = 70%

278 Cooking energy efficiency as griddle system efficiency = $4.57/70\% * 38\% = 2.48 \text{ kWh} = 408 \text{ Watts/ft}^2$

279
280 While this approach produces a mathematically equivalent idle energy rate threshold for both gas and
281 electric griddles, it fails to adequately account for the differences in idle performance data between the two
282 types of griddles. The data suggests that electric griddles can operate at a lower relative idle energy rate
283 than their gas-fired counterparts. Therefore, additional data on standard-efficiency electric griddles will be
284 required to justify relaxing the idle energy rate requirement for electric griddles.

285
286 Stakeholders should send data and other supporting information regarding **standard efficiency electric**
287 **griddles** to Rebecca Duff at rduff@icfi.com by **April 3**. Based on stakeholder feedback, EPA will propose
288 a revised electric idle energy rate in the Final Draft specification, scheduled for early April.

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291 **Double-sided griddles may qualify for ENERGY STAR under the following conditions:**

- 292
293 (1) Integrated, double-sided units with full top platen ($\geq 90\%$ coverage from side to side) must test
294 and qualify as a double-sided griddle.
295 (2) Integrated, double-sided unit with partial platen(s) ($< 90\%$ coverage from side to side) must test
296 and qualify as a single sided griddle (with top up and turned off).
297 (3) Double-sided units with add-on top platens (full or partial) must test and qualify as a single sided
298 griddle (with top up and turned off).

299
300 **Note:** Integrated refers to double-sided griddles designed to operate only while using a top platen. Add-on
301 top platens are sold to end users as options to a single sided griddle and can be added on to a base
302 model at the factory level or installed in the field.
303

304 **Note:** The existing ASTM F1605 test method does not provide guidance on how to conduct a cooking
305 energy efficiency test on double-sided griddles with partial top platens. These configurations are growing
306 in popularity and offer the end user flexibility in operation. Instead of excluding these griddles from the
307 specification, EPA developed a proposal that defines full and partial double-sided griddles based on total
308 coverage of the top platen(s). Under this proposal, the partial platen configuration would be required to be
309 tested as a single sided griddle (top up and turned off). This proposal was presented at the February
310 stakeholder discussion and EPA received several comments from stakeholders during and after the
311 meeting. An additional concern was raised regarding manufacturers that sell top griddle options (full and
312 partial), which might be used to qualify the unit as ENERGY STAR. In this case the griddle could also be
313 sold as a single-sided griddle, even though it does not meet the ENERGY STAR requirements without a
314 top platen giving the manufacturer an unfair competitive advantage.

315
316 In response to this concern, EPA has revised its initial proposal to require that *all* double sided units with
317 add-on top platens (full or partial) are required to be tested and qualify as single-sided griddles. Double-
318 sided griddles with integrated platens measuring less than 90% side to side would also need to be tested
319 as a single-sided griddle. Testing conducted by PG&E's Food Service Technology Center (FSTC)
320 supports this approach, indicating that if a griddle can meet the ENERGY STAR idle energy rate in a
321 single-sided configuration then it will meet it as a partial and double-sided unit. EPA also clarified that the
322 percentage coverage applies to the griddle width (side to side) as opposed to total surface area to better
323 represent the cooking surface area. Manufacturers are encouraged to provide feedback on this proposal.

324
325 The original proposal for griddles with partial top platens can be reviewed in EPA's presentation posted to
326 the ENERGY STAR Web site at www.energystar.gov/productdevelopment (Click on New Specifications in
327 Development). The single, partial, and double-sided idle energy rate comparison chart is also available on
328 the ENERGY STAR Web site.

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331 **4) Test Criteria:** Partner is required to perform tests and self-certify those product models that meet the
332 ENERGY STAR guidelines. The test results must be reported to EPA using the Commercial Griddles
333 Qualifying Product Information (QPI) Form. When testing commercial griddles, the partner must use
334 the following test procedures to determine ENERGY STAR compliance:

- 335
- 336 • ASTM F1275: *Standard Test Method for the Performance of Griddles*
- 337 • ASTM F1605: *Standard Test Method for the Performance of Double-Sided Griddles*
- 338

339 Manufacturers may submit qualifying product information representing an entire family of griddles
340 using one QPI Form according to the following procedures:

- 341
- 342 1) Test and submit a completed QPI Form for the representative 3' griddle within the product family.
- 343 2) Attach to the completed QPI Form, equipment specification sheets for each griddle to be qualified
- 344 within that family. These sheets must provide proof that the design and insulation specifications for
- 345 these additional models are identical to that of the 3' unit.
- 346 3) If product family includes units smaller than 3', manufacturer must test and qualify that unit
- 347 separately from its product family.
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349 **Note:** ASTM standards define cooking energy efficiencies for heavy-load (roughly four hamburger
350 patties per square foot) and light-load (four hamburger patties per load) conditions. For purposes of
351 ENERGY STAR, cooking energy efficiency is measured at heavy-load conditions.

352
353 **Note:** One stakeholder suggested that EPA use the water-boil efficiency test, which would eliminate the
354 need for laborious cooking energy efficiency testing. This comment was discussed in detail during the
355 February stakeholder meeting. A water-boil test was once included in the ASTM test procedure but was
356 dropped because it was not necessarily representative of cooking-energy efficiency and did not provide a
357 production capacity. Also, cooking energy efficiency is dependent on controls whereas water boil does not
358 take efficient controls or control strategies into consideration as it effectively bypasses any controls on the
359 griddle and only provides a rough indication of heat transfer efficacy. Stakeholders agreed that the current
360 ASTM test method is the best indicator of product performance, providing the end user with consistent
361 results that emulate real world operation.

362 **Note continued:**

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364 **Qualifying Product Families:** To relieve some of the testing burden that comes with griddle testing, EPA
365 is allowing manufacturers to test and submit results for a representative 3' griddle to qualify a product
366 family for ENERGY STAR. Based on testing conducted by FSTC, griddles sharing the same engineering
367 design within a product family exhibit similar cooking energy efficiency and normalized idle energy rate as
368 the smaller 3' model. Initial testing suggests that a 2' griddle within the same product family experiences
369 an idle energy rate that is not in-line with larger griddle sizes. This is why EPA did not choose the smallest
370 unit to be representative of the product family. Therefore, manufacturers will need to test and submit
371 results on their 2' griddles separately for ENERGY STAR qualification.

372
373 **Testing Tolerances:** One stakeholder asked what the allowable margin of error for cooking energy
374 efficiencies would be under the ENERGY STAR program. For ENERGY STAR qualification, the unit must
375 meet the cooking energy efficiency requirements proposed in Tables 1 and 2, above, rounding to the
376 nearest whole number. Margin of error is addressed in the current ASTM test methods (i.e., three tests,
377 uncertainty < 10%) and therefore, it does not need to be addressed in the ENERGY STAR specification.

378
379 **Griddle Plate Options:** During the February stakeholder meeting, several stakeholders brought up the
380 issue of qualifying griddles with different griddle plates. Typically, the model number will not change
381 based on griddle plate, which could impact the energy profile of the griddle. It is important that the end
382 user purchasing ENERGY STAR be assured that the griddle will meet the requirements of the
383 specification regardless of griddle plate option. Therefore, EPA is proposing that all griddle plate options
384 be required to meet the specification requirements for a model to qualify as ENERGY STAR. This will
385 avoid any confusion as to which griddle plate options actually meet ENERGY STAR requirements
386 especially in situations where all of these options are provided on the same specification sheet. Another
387 option would be for manufacturers to assign a unique model number to the different griddle plate options
388 so it is clear what combination(s) meets ENERGY STAR requirements. Manufacturers are encouraged to
389 provide feedback on this proposal.

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391 **Certification of Test Results:** Several stakeholders have expressed concern regarding the quality of self-
392 testing and reporting of product performance. One stakeholder suggested that the reporting of qualified
393 ENERGY STAR models be provided by organizations certified to test to ASTM F1275 and F1605. As
394 discussed during the February stakeholder meeting, ASTM does not certify test laboratories and requiring
395 third-party testing would be a challenge due to the limited number of facilities available to test griddles.
396 Instead, EPA will require that a test report be submitted along with the ENERGY STAR Qualified Product
397 Information form, which will require the signature of a test laboratory or company representative confirming
398 the results.

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402 **5) Effective Date:** The date that manufacturers may begin to label and promote qualifying products as
403 ENERGY STAR will be defined as the *effective date* of the agreement. The ENERGY STAR
404 Commercial Griddle Specification shall go into effect on **May 1, 2009**

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406 **Note:** The Draft 1 specification proposed a February 1, 2009 effective date in conjunction with the North
407 American Association of Food Equipment Manufacturers (NAFEM) Show. However, on November 19,
408 2008, EPA announced that additional time was needed to collect data, conduct research, and hold
409 additional discussions with manufacturers with the goal of determining how to: (1) appropriately address
410 double-sided griddles with top platens that provide only partial coverage and (2) further build EPA's
411 reference data set, particularly for electric models. Instead, EPA held an industry stakeholder meeting on
412 February 4, 2009 to discuss a new proposal based on this additional research. This Draft 2 specification
413 represents that initial proposal and subsequent discussions with stakeholders.

414
415 During this meeting, EPA also shared a new timeline with stakeholders, including a proposed effective
416 date of May 1, 2009 and launch during the National Restaurant Association (NRA) Show, May 16 – 19,
417 2009. Based on comments and data received in response to this Draft 2 proposal, EPA intends to release
418 a Final Draft version of the specification in early April, allowing stakeholders another two weeks to submit
419 final comments prior to finalization on May 1.

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6) Future Specification Revisions: EPA reserves the right to change the specification should technological and/or market changes affect its usefulness to consumers, industry, or the environment. In keeping with current policy, revisions to the specification are arrived at through industry discussions. In the event of a specification revision, please note that ENERGY STAR qualification is not automatically granted for the life of a product model. To carry the ENERGY STAR mark, a product model must meet the ENERGY STAR specification in effect on the model's date of manufacture.

Partial Platen Performance: At the time of developing this Version 1.0 specification, the ASTM F1605 test method for measuring double-sided griddle performance could not be applied to units with partial platens. However, there is industry interest to revise the test method to more appropriately measure cooking energy efficiency and idle energy rate of double-sided griddles with partial platens. If new ASTM testing guidelines are developed for partial platen configurations, manufacturers will be required to test and qualify these units for ENERGY STAR using the new test method.

Note: A statement has been added that if a test method is developed through ASTM F1605 to measure cooking energy efficiency and idle energy rate for double-sided griddles with partial top platens, then manufacturers should use that new test method to test and qualify units as ENERGY STAR.