

**Comments on Draft 3
Coca-Cola North America
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Both the Energy Star Draft 3 Version 2 specification, and the ASHRAE Interpretation referenced are ambiguous on the matter of energy management devices. The ASHRAE Interpretation states that the energy management device "never change to a new AT (average temperature) after the test has been concluded." And a direct quotation from the Draft 3 Energy Star specification says "the energy management device will never change to a new integrated average product temperature after the test has been concluded."

This is a contradiction. If an energy management control never changes the machine operation after the test is concluded, then it is not an energy management control... it is just a routine refrigeration controller.

There are several energy management devices available for commercial refrigerators - manufactured by Carel, USA Technologies, Invensys, Elstat, Fullgauge, Mexicorp, and others. And every single one of those energy management controls operates by changing the average product temperature to save energy.

So basically what ASHRAE and Energy Star is saying is that you cannot use an energy management control. The text says that you can use one... but by the additional statements they are saying that you cannot use one. This is a contradiction.

This must be corrected.

The approach that the Energy Star specification should take is to:
Allow the energy management device to be set so that the ASHRAE test be conducted with the integrated average 38°F temperature, running steady state for the duration of the entire test to establish the maximum steady state energy consumption. That is the energy level that determines whether the refrigerator satisfies the Energy Star requirement.

The energy management control then becomes "gravy". It only gives additional benefit, and does not count toward establishing the Energy Star performance.

It would be regrettable to have an Energy Star specification that prohibits energy savings.