

May 25, 2007

Mr. Richard Karney, PE
ENERGY STR Program Manager
U.S. Department of Energy

Dear Mr. Karney:

Re: Comments from Natural Resources Canada on Proposed Changes to the ENERGY STAR Criteria for Refrigerators

Natural Resources Canada would like to thank you for the opportunity to comment on the proposed changes to the ENERGY STAR criteria for residential refrigerators.

In 2001, the Government of Canada signed an agreement with the US Environmental Protection Agency (US EPA) and the US Department of Energy (US DOE) to administer the ENERGY STAR Program in Canada.

Since this is very much of an integrated marketplace, the qualifying levels and technical specifications for the ENERGY STAR qualified products promoted in Canada are typically harmonized with those of the United States. Care is taken to ensure that the ENERGY STAR technical specifications and levels are in step with Canadian standards and activities, as well as the climate conditions of this country.

Manufacturers and distributors of energy using equipment consider that the integrated nature of the American and Canadian ENERGY STAR initiatives is very important and provides a very coordinated approach for marketing and distributing products in both countries. Consequently, any substantial changes to the qualifying criteria to the ENERGY STAR program in the U.S. would have a significant impact in this country.

The *Office of Energy Efficiency of Natural Resources Canada* agrees that the ENERGY STAR qualifying level for refrigerators should be raised from 10% to 20% above the federal levels with no changing levels for freezers and compact refrigerators and freezers.

The proposed value will be feasible to achieve for industry, and, at the same time the ENERGY STAR label would more effectively assist the consumers to differentiate products in the marketplace, where presently approximately **50%** of all available refrigerators are currently ENERGY STAR qualified products (*see Table 1*).

In response to a proposal to update the criteria for ENERGY STAR qualified refrigerators, we have reviewed our Canadian database of model numbers submitted by manufacturers and dealers for this product category as per their reporting requirements under Canada's Energy Efficiency Regulations. The information in this database reflects SKUs available in the Canadian marketplace, and is not shipment weighted. This information, found in Table 1 summarizes the information as of May 1, 2007.

Table 1 - Refrigerators - Canadian Database*

<i>Number of Models</i>	<i>< 18 ft3 E* (non-E*)</i>	<i>≥18 ft3 to < 22 ft3 E* (non-E*)</i>	<i>≥22 ft3 to ≤ 26 ft3 E* (non-E*)</i>	<i>> 26 ft3 E* (non-E*)</i>
Bottom Freezer	32 (26)	194 (42)	115 (11)	-
Top Freezer	49 (388)	364 (613)	14 (8)	-
Side Freezer	-2	142 (52)	645 (329)	62 (46)
No Freezer	83	7 (4)	-	-
Inside Freezer	1 (83)	-	-	-
<i>Total</i>	<i>165 (622)</i>	<i>707 (711)</i>	<i>774 (348)</i>	<i>62 (46)</i>
Subtotal	787	1418	1122	108
TOTAL	3435			
<i>ENERGY STAR</i>	<i>1,708 (53 compact)</i>			
<i>Non-ENERGY STAR</i>	<i>1,727 (179 compact)</i>			

*As of May 1, 2007.

E* denotes ENERGY STAR qualified.

Table 2 illustrates the impact of the proposed new ENERGY STAR criteria (provided on April 27, 2007) on the qualified ENERGY STAR products available in the Canadian database. This table shows a significant drop in the number of qualified ENERGY STAR refrigerators models available in the Canadian market from 50% to 5% (change from 1708 qualified items to 184 approximately 10% of all available models).

Table 2 - Refrigerators - ENERGY STAR Qualified Products*

<i>Number of Models</i>	<i>< 18 ft3</i>	<i>≥18 ft3 to < 22 ft3</i>	<i>≥22 ft3 to ≤ 26 ft3</i>	<i>> 26 ft3</i>
Bottom Freezer	-	46	17	-
Top Freezer	1	15	-	-
Side Freezer	-	5	32	4
No Freezer	63	-	-	-
Inside Freezer	1	-	-	-
<i>Subtotal</i>	<i>65</i>	<i>66</i>	<i>49</i>	<i>4</i>
TOTAL	184 (53 compact)			

*based on the proposed new criteria for standard refrigerators at 20% above the federal levels

As you can see (Table 2), a reasonable selection of models is still available in each size category in the Canadian market.

We also agreed, that the present ENERGY STAR qualification levels at 20% above the federal levels for compact refrigerators, should remain unchanged. The compact refrigerators represent only 7% of the total refrigerators (available in the Canadian market) and any changes could, at best, have a minimal effect on energy savings.

FREEZERS

Table 3 shows a distribution of freezers available in the Canadian database (not shipment weighted) under present regulatory requirements and ENERGY STAR specifications.

Table 3 - Freezers - Canadian Database*

<i>Number of Models</i>	<i>Type 8 E* (non-E*)</i>	<i>Type 9 E* (non-E*)</i>	<i>Type 10 E* (non-E*)</i>	<i>Compact (Type 16, 17 and 18) E* (non-E*)</i>
Upright Freezer	11 (68)	63 (67)	-	-14
Chest Freezer	-	-	51 (99)	-93
Subtotal	79	130	150	107
TOTAL	466			
ENERGY STAR	<i>125 (no compact)</i>			
Non-ENERGY STAR	<i>341 (107 compact)</i>			

*As of May 1, 2007;
E* denotes ENERGY STAR qualified.

This table shows that at present, approximately 27% of all available freezers in the Canadian market are qualified ENERGY STAR products (*125 qualified models*). Changing, for instance, the ENERGY STAR qualifying criteria from 10% to 20% above the federal levels will leave consumers with only 16 models qualified with a minimal overall energy savings.

It should be noted that presently there are no *compact freezer* models qualified as ENERGY STAR in the Canadian market. Any changes applied to compact freezer would not have any impact on the models available on the market.

Also, we would like to mention that NRCan supports the inclusion of proper wording and instruction in the Test Criteria that would prevent circumvention of test criteria in models with modern technology and sensors. Also, please note that the new Canadian standard (CSA/C300), presently under the revision, will also include the official language preventing any circumvention during the testing procedure.

With respect to the effective date, NRCan strongly suggests implementing a coming into force date of one year following the acceptance of the criteria, to allow for sufficient time for manufacturers and retailers to prepare and adapt to the new requirements.

Thank you for your consideration of our comments.

Best Regards,

Renata Mortazavi, M.A.Sc.
Senior Standards Engineer
Housing and Equipment
Office of Energy Efficiency
Natural Resources Canada
TEL: (613) 992-5474/ FAX: (613) 944-6365

cc: Katherine Delves
Anne Wilkins

