

Please find below comments from LBC Bakery Equipment, Inc. regarding Draft 1, Version 2.2 of the Energy Star, Commercial Oven Specification:

1. Submitted with Draft 1 are two scatter charts representing the market of available equipment, and where they are positioned with respect to the proposed qualification criteria. For double rack ovens there are 22 dots with four dots falling in the qualifying field (Lower Right). To our knowledge there are not more than seven rack ovens available for sale in the U.S. with approvals to national safety and sanitation standards (e.g., ETL, UL, NSF). If the chart represents all known equipment on the market and all previously available equipment, the number would be closer to 15. However, including equipment that does not meet safety standards or that is no longer commercially available does not serve the purpose of Energy Star, which is to provide an incentive for consumers to purchase products that save energy and cause less harm to the environment. **The data used for establishing thresholds for approval should be revised to represent only products that are truly available on the market and that are deemed safe according to nationally accepted safety standards.**
2. As discussed in point 3 below, rack ovens spend much time idling. Section 3.D of the proposed specification states the calculation of Idle Energy Rate shall not include electrical energy consumed by auxiliary components. By this method, a great deal of energy and cost are being overlooked. Electrical energy accounts for approximately 15% - 25% of the total energy cost necessary to operate a double rack oven (see table below), and much of that cost is incurred when the oven is idling. There are a number of currently available double rack ovens that would marginally not qualify for Energy Star, yet consume approximately 50% less electrical energy than one model that would qualify for Energy Star. By excluding electrical energy when idling from the Energy Efficiency Requirements, the proposed specification would approve models that actually consume more energy and cost more to operate than models that would not meet approval. **The Energy Efficiency Requirements for rack ovens should be modified to include electrical energy consumed while idling.**
3. Industry surveys show that approximately 75% of rack ovens purchased in the U.S. are by supermarkets. Perishable goods, such as baked goods, are of keen interest to supermarkets, and they structure their operations in an attempt to never run out of staple items while keeping spoilage to a minimum. As such, the most common method of operating a retail bakery in a supermarket is to bake the largest load of product early in the work shift and then bake intermittently throughout the day. The day is sometimes much longer than 12 hours. Most of the time a rack oven is operating it is idling, not baking. This claim can be substantiated by other credible industry sources. So the importance of idle energy consumption and the ability of the oven to conserve energy with low energy features and set-back modes is crucial to reducing the total energy consumed by rack ovens each year. In order to truly save energy, **Energy Star qualification should be based on a calculation of total annual energy consumption** per ANSI F2093-11. This is not difficult, since most of the possible candidates have this calculation in test reports by third party agencies and those who do not have this calculation have included the data needed to perform the calculation. To ignore this facet of analysis which is readily available is to do a disservice to the efforts that have gone into reducing total energy consumption by the industry and its customers.