

Email received on January 4, 2010 from InterMetro Industries

Comments on ENERGY STAR Enhancement Plans

(Edited by EPA)

to: Bryan Berringer

01/04/2010 11:34 AM

Dear Mr. Berringer:

I have reviewed the Enhanced Program Plan for ENERGY STAR Products and generally agree with the proposals. However, one area concerns InterMetro Industries. That is in the requirement of third party laboratories to verify qualifying products (Section 6.1 "All products will be required to be tested in an accredited laboratory...."). The only type of product we manufacture that falls under the Energy Star program is commercial hot food holding cabinets. We do our Energy Star tests for Commercial Hot Food Holding Cabinets in-house using calibrated equipment and the required ASTM F2140-01 test method. We are approved as a Generic Test Laboratory by the California Appliance Efficiency Program (see attachment). I suggest a similar certifying program for the Energy Star program. Our cabinets come in various sizes and configurations. We do a lot of Energy Star testing as we develop products. Doing the tests in-house allows us to keep costs down and meet tight schedules.

InterMetro Industries currently uses the following Nationally Recognized Test Labs (NRTL): UL, NSF, CSA and MET Labs for various product safety testing and accreditation. None of them is quick to respond to our needs and they are expensive to use compared to in-house testing. Energy Star testing is not safety related. Forcing manufacturers to ship large equipment around the country is expensive. Getting into a NRTL schedule is time consuming and the testing will add much cost to our product development. We have invested the time and money to be able to do our Energy Star testing in-house and I believe we should have the option to continue to do so.

In today's economy, the federal government should do everything possible to help domestic manufacturers remain competitive. Forcing us to use third party test labs for non-safety testing will not help the economics of our business and would more than likely discourage most manufactures from pursuing new Energy Star requirements, thus making any changes unsuccessful. Spot checks, or off the shelf testing, can and should be done by third party agencies to keep manufacturers "honest" and to test for products that do not meet the Energy Star requirements. Stiff fines should be imposed on manufactures that wrongfully falsify test results to get their products listed as Energy Star compliant. However, InterMetro Industries believes to qualify products, we should be able to certify our in-house test lab similar to the way California does, and do the testing ourselves.

If you have any questions regarding my comments, please feel free to contact me.

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