
From: Scott Ehaney [SHE@perlick.com]
Sent: Monday, April 05, 2010 11:33 AM
To: ENERGYSTARVerificationProgram@energystar.gov
Subject: FW: Enhanced Testing And Verification

Follow Up Flag: Follow up
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The Perlick Corporation supports the Memorandum Of Understanding between the DOE and the EPA as well as their efforts to advance energy efficiency. We also recognize the need to ensure the integrity of the Energy Star program and the validity of the products that carry the Energy Star logo. However, we do not support the proposal of third party qualification and verification testing. Many manufacturers, like ourselves, have invested significantly in equipment, personnel, and accreditations in an effort to bring products quickly and efficiently to the market in a timely manner. This is critical in today's economy. Our ability to do in-house testing is key to our success. Agencies that list products for safety, (such as UL and ETL), and sanitation (NSF), allow for in-house testing for laboratories and personnel that meet certain accreditations. This has been a very successful means of ensuring products that meet the safety and sanitation levels that the end consumer expects. Certainly, the UL logo evokes a confidence of safety in almost all consumers. The Perlick Corporation believes that using this as a model, we can ensure the validity of energy efficiency data by focusing on lab accreditations and trained personnel as opposed to third party testing.

As a manufacturer of commercial food service equipment, we would also like to point out that our products, (as well as countless others in the CFS arena), do differ from many other Energy Star products. Most of our equipment is "custom" made. We have very few made to stock or off the shelf products. However, we do have many models. Our products are also significantly more costly to produce than most other Energy Star products. There is a appreciable additional financial burden for us to provide a product for third part qualification or verification testing as opposed to a manufacturer of light bulbs for instance. When we develop a product, achieving Energy Star is always a goal. The additional costs associated with third party qualification and verification testing will be prohibitive, especially on products with lower sales volumes. We believe this will lead to less products in many sectors seeking an Energy Star listing, and thus, leaving the consumer with fewer choices when seeking an energy efficient product. Energy Star would be most effective by being all inclusive and spurring spirited competition from all manufacturers to provide the most energy efficient products possible.

Best Regards,

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