
From: Matt Allison [Matt.Allison@scotsman-ice.com]
Sent: Thursday, April 01, 2010 2:52 PM
To: energystarverificationprogram@energystar.gov
Cc: Tresso, Rico; Jeff Biel
Subject: Comments On Pending Energy Star Certification Changes

To Whom It May Concern:

I am writing to communicate some thoughts with respect to the pending changes coming to the Energy Star program related to qualification and verification testing. Specifically, I would like to address commercial cube ice makers.

Most commercial cube ice maker manufacturers today certify their products through the Air Conditioning, Heating and Refrigeration Institute (AHRI). This program has been in place for several years and has been very successful. In this program, manufacturers self certify and AHRI contracts with a third party lab for verification testing. I would like Energy Star to consider the possibility of continuing to use this program to certify commercial cube ice makers for Energy Star.

Although the qualification testing portion of the new requirement is self done in this program, the audit requirements keep the manufacturers honest. There are processes in place to deal with failed audits (more testing and fines) that provide the incentive required for honest reporting. Adding further requirements to a program that is already serving its purpose will only add costs without any benefit.

I understand the reason for the new requirements is that some manufacturers were claiming Energy Star compliance when in fact they were not compliant. It seems punitive to add to the costs of all the manufacturers who were reporting honestly to deal with the few who were not. It seems to me that a third party audit system would be adequate for any product type and would accomplish what Energy Star wants to achieve without undue costs.

Thanks in advance for your consideration,

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