



April 30, 2010

Ms. Kathleen G. Vokes
US Environmental Protection Agency
Climate Protection Partnership Division
ENERGY STAR Program
1200 Pennsylvania, Ave. NW.
Washington, DC 20460

Dear Ms. Vokes:

Taylor Company has long been a supporter of the ENERGY STAR program and the value it brings to the commercial griddle market. We applaud EPA requirements for testing data on new equipment listings and subsequent ENERGY STAR qualification review. It was with great interest that we reviewed the EPA's proposed changes to the ENERGY STAR program for commercial cooking equipment and offer our feedback as a result of this review.

Most importantly, we are encouraged by the overall long term benefits these program changes will bring to the industry. We are, however, concerned with the significant implementation costs and potential for unintended consequences the current proposal may create.

1. Requirement of a third party lab to conduct ENERGY STAR testing

Today, many manufacturers have made investments to conduct tests in their own in-house lab environments. All of the manufacturers who run these tests use calibration instruments and trained personnel to perform the test required by multiple agencies for approval on their equipment. The investment allows manufactures to control costs and efficiently deliver product to market. A third party lab testing requirement adds both cost and time to market product delivery.

The training and certification of third party lab personnel is also a concern. This 'accreditation' process could easily take from six – eighteen months creating an additional delay getting products to market.

2. Requirement for verification testing of listed models

Prior to ENERGY STAR qualification submission, our Griddles go through a series of component and standard test required by various approval agencies. We feel these other agency files could be part of the ENERGY STAR qualification process to document the Griddle from a component and construction level. A third party could use this type of documentation in determining if future unit changes are thought to impact the energy efficiency of the Griddle. We are certain that adding a cost burden to conduct verification tests on units which have not changed since they were originally qualified is not the intention of the proposed changes. We recognize the

P.O. Box 410 • Rockton, Illinois 61072-0410
815-624-8333 (phone) • 815-624-8000 (fax)

International Office: Via dei Pirenei, 15 • 00144 Roma, Italy
39-6-591-6561 (phone) • 39-6-592-4379 (fax)

www.taylor-company.com

need for ENERGY STAR to come up with a method to determine if the current models still qualify to remain in the ENERGY STAR program.

The requirement for testing of listed models as part of the verification process is also of concern. Taylor currently builds commercial cooking equipment to order. The cost of verification to the current test methods is very expensive and since these pieces of equipment are not off of the self type items a special unit would be required for this type of testing. Once the testing is complete we would not be able to sell the unit because the unit will no longer be considered new. As currently proposed, each unit would be defined as its own model necessitating its own verification testing. This will only multiple the cost burden to the manufacturer which in the long term has to be passed onto the consumer. We are certain this is not the intent of the proposal.

3. Requirement of a third party administrator

We agree a third party administrator is needed to insure the consistency and credibility of the verification testing protocol and to validate labs for ENERGY STAR testing. We would hope the duties of the administrator could be enhanced to include the construction/design review described in the previous section and should be considered as an alternative to the requirement for verification testing of each model.

4. Timeframe

While we are confident the EPA recognizes the scope of the proposed changes will take time, no timeline for implementation, phase-in period, etc. has been addressed in any of the released documents or conference calls with manufacturers. Previous revised standards have included an effective date target based on input from impacted parties that allows manufacturers time to check their equipment, make changes to meet the new requirements, arrange for additional testing as needed, and receive agency approval of equipment changes.

To resolve these concerns, Taylor asks the EPA to consider the following modifications to their proposed changes of the ENERGY STAR program:

1. The EPA will establish and provide to manufacturers lab qualification requirements needed to conduct ENERGY STAR testing.
2. An administrator of this program will conduct a review and appropriate audit of labs seeking approval to conduct ENERGY STAR testing.
3. Manufacturers with certified labs will be allowed to conduct ENERGY STAR tests at their location for qualification of new products and if required future verification testing is needed. Third party labs would also be certified as another testing option.
4. A program manager will be authorized to conduct an audit of ENERGY STAR listed equipment to determine if verification testing is needed. This review will be conducted using other agency documentation covering the components and construction of the unit. The administrator of this program will be authorized to waive

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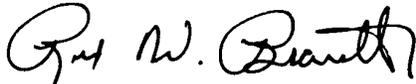
a verification test if no unit changes were made impacting energy efficiency from the time of the original ENERGY STAR program approval. The audit cycle should insure that all ENERGY STAR listed equipment receive a review every five years and should include a phase-in allowance related to the proposed changes.

5. Existing ENERGY STAR qualified equipment should remain in the program until the verification program has been fully implemented. At that time, these products will be placed into the verification program and reviewed as part of the five year audit cycle.

Taylor encourages EPA to consider these points before implementing the proposed changes. Our recommendations are designed to support the proposed strengthening of the program, while managing the cost and time to market consequences inherent in the current proposal. I thank you for your consideration and personally look forward to working with the EPA on these changes.

If you have any questions, please feel free to contact me at once.

Very truly yours,



Rex W. Brandt
Senior Agency Approval Engineer
E-mail: rbrandt@taylor-company.com

Cc: Dipak J. Negandhi, Unified Brands
Charlie Souhrada, NAFEM
Rebecca Duff, ICF

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