Food Service Technology Center
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FISHER NICKEL inc.

May 28, 2010

Kathleen G. Vokes
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW, MC 6202J
Washington, DC 20460

Dear Ms. Vokes:

The Pacific Gas and Electric Company's Food Service Technology Center (FSTC) has long been considered the industry leader in providing unbiased energy efficiency information for the restaurant and hospitality industries. Following requests from end-users such as McDonald's Corporation, Marriott Corporation, and the National Restaurant Association, Pacific Gas and Electric Company (PG&E), in 1987, initiated efforts to develop American Society for Testing and Materials (ASTM) Standard Test Methods to measure the energy consumption and performance of commercial foodservice equipment. These standards allow benchmarking of equipment such that users can make meaningful comparisons among available equipment choices. By collaborating with the Electric Power Research Institute (EPRI) and the Gas Technology Institute (GTI) through matching funding agreements, the FSTC built up a reputation as being unbiased to fuel choice or equipment supplier.

The Food Service Technology Center is operated by an independent consulting firm, Fisher-Nickel, inc., for PG&E under the auspices of the California Public Utilities Commission's energy efficiency initiative using public goods funding. Since 1987, the FSTC has developed 37 standard test methods for commercial food service equipment performance that have been ratified by ASTM. The application of an ASTM Standard Test Method (STM) to cooking equipment provides end-users with performance parameters that can be used to compare the energy efficiency, production capacity, cooking surface/cavity uniformity, etc. of one piece of equipment with another. The FSTC has tested sufficient models to create a database of energy performance for many appliance categories. Much of this data, generated using ratepayer-based funding, were used to establish the ENERGY STAR specifications for commercial foodservice equipment.

In addition to the work within PG&E territory, the FSTC has partnered with the Southern California Edison Foodservice Technology Center and the Southern California Gas Foodservice Equipment Center to expand the testing and reporting of commercial foodservice equipment performance in accordance with ASTM test methods. This testing not only serves to qualify models under the ENERGY STAR program, but also supports the comprehensive California Investor-Owned Utility (IOU) energy efficiency programs.

As a leading technical resource to the foodservice industry, the combined Centers maintain the highest levels of excellence in providing unbiased and relevant information on equipment performance. The

Centers are staffed by trained engineers and equipment is calibrated on a regular basis. The proposed requirement for laboratory accreditation per ISO 17025 would place an undue financial burden on California ratepayers in the IOU-led effort to provide relevant energy information on commercial foodservice equipment, potentially eliminating the FSTC and the other California utility laboratories from the ENERGY STAR stable of resources.

We appreciate the opportunity to provide input to help maintain this important program and we look forward to continuing the discussion.

Sincerely,

David Zabrowski
Director of Engineering
Fisher-Nickel, Inc./PG&E Food Service Technology Center

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