

From: Dean Stanley [mailto:dstanley@accutemp.net]
Sent: Friday, October 17, 2008 1:08 PM
To: Duff, Rebecca M.
Cc: schmeltz.rachel@epa.gov; dzabrowski@fishnick.com
Subject: AccuTemp Products ENERGY STAR Commercial Griddle Draft 1 Version 1.0 Specification Comments

Rebecca,

After analyzing the Draft 1 Version 1.0 energy efficiency requirements more closely, I have following comments to formally submit:

- 1) The useable cooking surface area should be utilized, rather than the maximum cooking surface area, when calculating the normalized idle energy rate.
- 2) The normalized idle energy rate should be measured with the cooking surface in a used condition that is closer to real-world use (not new or end-of-day clean). This idea follows Comment #1, where measuring values in desired performance and real-world scenarios are the most representative way for a meaningful ENERGY STAR qualification.
- 3) The gas and electric griddle population data should be published publicly to allow manufacturers to survey the competitive landscape, understand the formulation of the performance parameters and offer any related comments to the EPA for further improvements of the Draft 1 Version 1.0 specification.

Best Regards,

Dean Stanley
VP, Engineering