



TO: Rebecca Duff (ICF International)

CC: David Zabrowski (FSTC)

DATE: 4/3/09

RE: ENERGY STAR Griddle Draft 2 Comments

I am pleased that the Draft 2 Eligibility Criteria listed a revised gas griddle normalized idle energy rate value to 2,650 BTU/hr per ft² to properly differentiate high and standard efficiency electric griddles.

But I remain concerned about an accurate representation of the electric griddle market by the dataset that the EPA has shared so far, primarily the normalized idle energy rate. Below I am either recycling old or adding new comments regarding the electric griddle dataset:

- 1) During the February 4, 2009 stakeholder meeting at the NAFEM Show, Rachel Schmeltz admitted that the lower end performing products were not well represented in the electric griddle dataset. As far as I am aware, this dataset has not changed, thus her opinion, as an EPA opinion if she were still on this project, would be unchanged. I do not know Christopher Kent's opinion, the current EPA representative, on this subject.
- 2) In lieu of additional data, during the February 4, 2009 stakeholder meeting at the NAFEM Show, I recommended that some professional judgment (i.e., personnel from the FSTC or other test labs) be applied to the datasets to adjust the data due to the fact that the lower end performing products were not well represented.
- 3) During the February 4, 2009 stakeholder meeting at the NAFEM Show, Don Fisher (FSTC), provided his subjective and qualitative view of the electric griddle dataset, by recommending that relaxing the normalized idle energy rate to 350 kW/ft², would allow another three manufacturers (who already met the cooking energy efficiency requirement) to achieve the normalized idle energy rate.
- 4) I would recommend that all dataset data be verified as currently available models, so that the dataset's relevance to today's market is not further diluted by old performance data for models not currently available.
- 5) With regard to the Draft 2 request for griddle test articles or performance data on standard efficiency griddles, AccuTemp has been unable to provide any assistance. We do not have any competitive standard performance griddles nor any internal test data for these griddles.
- 6) I do strongly support augmentation of the dataset, which I am unaware of any progress on this activity. I am hopeful that in the next few weeks, the EPA can

acquire additional information to establish a relevant dataset before the final specification is released in April.

- 7) If the dataset is not able to be improved so that it is representative of the current market, I recommend the one of following options be selected, going forward:
- a. Use professional judgment by experienced industry test engineers and test labs, as mentioned in items 2 & 3 above, to properly set the normalized idle energy rate at an appropriate level.
 - b. Implement a phased approach, as was discussed at the February 4, 2009 stakeholder meeting at the NAFEM Show and mentioned in the Draft 2, where less stringent performance values (determined by the item 7a process above) would be released in a first phase, with a 1 – 2 year timeframe (I recommend 2 years, as Rachel had mentioned, since it takes quite a while to move these types of changes through a government program and it will take quite a bit of time for manufacturers to develop and release products that meet new requirements) before the second phase, where a more stringent set of relevant performance values would go into effect (I would not recommend using the initial Draft 1 & 2 values of 70% and 320 watts/ft² mentioned in the Draft 2, as these values are based on a flawed dataset).
 - c. Release the griddle category only for gas griddles, until a more representative electric griddle dataset can be completed. I know no one wants this to happen, but it would be wrong to release something that everyone knows is not accurate (using the Draft 1 & Draft 2 dataset and performance values) and diminish the quality of the ENERGY STAR program values.

If you have any questions regarding these comments, please contact me. I look forward to your release of the final specification later this month.

Best Regards,
Dean Stanley