



TO: Rebecca Duff (ICF International)

CC: David Zabrowski (FSTC)

DATE: 4/30/09

RE: ENERGY STAR Griddle Final Draft Comments

While I am pleased that the Final Draft Eligibility Criteria listed a revised electric griddle normalized idle energy rate Tier 1 value of 355 watts/ft², I remain concerned about an accurate representation of the electric griddle market by the dataset that the EPA has used so far, primarily for the normalized idle energy rate.

- 1) Due to the fact that two performance tiers have been released in this Final Draft, I would conclude that the dataset could not be improved so that it is representative of the current market. I do strongly support augmentation of the dataset, which I am unaware of any progress on this activity.
- 2) I would recommend that all of the current 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.
- 3) I think the use of the term "Tier" will be a confusing, as there are other industry energy-related programs that use this term to signify different permanent performance levels / classes of equipment. In this situation, "Tier" identifies a temporary performance level. I have been told that "Tier" is used in other ENERGY STAR categories, but in this case, I think it is a mistake. I would advocate some other term for this temporary category performance level, like "Phase 1", "Step 1", etc.
- 4) I think that since the electric griddle dataset is based on a non-representative market dataset, it appears to be presumptuous or premature to identify the "Tier 2" value already. Why isn't the value TBD?

If you have any questions regarding these comments, please contact me. I look forward to the category release on 5/8 May and launch at the NRA Show on 5/16.

Best Regards,
Dean Stanley