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Comments to EPA on Energy Star® Program Requirements for Commercial Griddles Specification Draft 2.

April 10, 2009

Christopher Kent
c/o Rebecca Duff, ICF
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Environmental Protection Agency
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1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Kent:

CEE appreciates the opportunity to provide comments on the ENERGY STAR specification for Commercial Griddles (Draft 2). The Commercial Kitchens Committee (the Committee) offers comments on three aspects of the Draft 2 specification: energy efficiency performance levels, definitions, and testing and reporting.

Energy Efficiency Performance Levels

The Commercial Kitchens Committee (the Committee) supports the draft 2, proposed energy efficiency levels for gas griddles.

Regarding electric griddle efficiency levels, the Committee is concerned that the proposed levels would not allow for a sufficient array of products to qualify; and efficiency programs would have difficulty marketing this measure as part of their programs. One important aspect of supporting foodservice efficiency programs is to have the ability to support a selection of products and manufacturers across a product category. Having this flexibility enables program administrators to engage a range of distributors and other partners within their service territories. For this reason, the Committee recommends that ENERGY STAR continue to request and incorporate additional data points to ensure that the final specification levels adequately balance the needs for significant energy savings and product availability.

Specification Definitions

The Committee suggests the following enhancements and modifications to the definitions section of the specification:

1. Inclusion of definitions for efficiency related terms used to calculate annual energy consumption, including “production capacity” and “preheat energy”. The Food Service Technology Center and American Society for Testing and Materials may be sources for these definitions.

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2. The Committee recommends that the griddle definitions (in A and B) not be limited by those products that have thermostatic controls. Removing the thermostatic control language would allow for future specification revisions to include manually controlled griddles, if and when an appropriate test method and data set exist. With this modification, eligible products would have to meet definitions A or B, and E.

Testing and Reporting

The Committee suggests the following enhancements to the sections of the specification related to testing and reporting:

1. ENERGY STAR states in the draft specification comment sections that a signed test report must be submitted with Qualified Product Information forms; however, the requirement is not stated in the specification. The Committee recommends that this requirement be made explicit in the text of the specification.
2. ENERGY STAR proposes in the draft specification comment sections that all griddle plate options must meet the specification requirements for qualification. The Committee requests ENERGY STAR provide additional information regarding testing and reporting requirements related to griddle plate options. It is not clear whether manufacturers will need to test each available griddle plate option to qualify by product and plate option or if by testing only the least efficient plate option they may qualify all plate options. If ENERGY STAR's intent is to allow testing of only the least efficient plate option, it is not clear how the tested option will be identified and verified as the least efficient option within the product family. The Committee also recommends that all model numbers and the corresponding plate options for each member of a product family be listed and explicit in the qualified products list.
3. The Committee requests that ENERGY STAR list, in the qualified products list, all model numbers associated with a product family and the square footage of each individual model to allow for enhanced energy efficiency program flexibility and administration.

Once again, CEE would like to thank the EPA for the opportunity to comment on the ENERGY STAR specification for Commercial Griddles (Draft 2). Please contact CEE Program Manager, Kim Erickson, at 617-337-9280 with any questions about these comments.

Sincerely,



Marc Hoffman
Executive Director