

Draft 1 - Energy Star Program Requirements for Commercial Griddles

Commitment Section

Line

- 18 Agreement that compliance to Energy Star certification is necessary and that the monitoring entity has full right to request a production unit at any time for verification to the standard.
- 24 What is the consequence for a manufacturer or equipment supply chain partner for unauthorized use of the Energy Star label? Do we need more structure to this clause?
- 38 Would suggest that reporting of new griddle models certified as Energy Star compliant be provided by the organizations that are certified to test to ASTM-F1275 and ASTM-F1605.
- 43 Even if reporting data is only to be used by EPA - I believe that this function should be voluntary on the part of the end users that are actively purchasing the equipment rather than from the manufacturers. What if energy rebates or LEED construction credits were only awarded if the sales were reported by the installation of these products? I believe the data would also allow EPA to see better who was purchasing these appliances by size of job, geography, influence, etc. There also may be legal issues in reporting sales figures between privately held companies and publically held companies.

Performance for Special Distinction

- 59-114 As this whole section is voluntary for the Energy Star Partner – I do not see any specific changes that are required. Manufacturers will make associations where they can gain a measurable market share or financial benefit to support cooperation.

Eligibility Criteria

- 128 Suggest that standard foodservice industry language is used (e.g. grooved griddle plate vs. “hot channeled cooking surface”.

153 Idle Rate Definition.

190 Idle rate is normalized across only the bottom section of the griddle will not account for devices where a top platen is not utilized over the entire base section. Many suppliers today offer the option of a single top platen mounted on a larger griddle unit. (e.g. Garland Xpress grill with single platen on three foot base unit or a platen head mounted to right, left or only in middle section).

If a griddle is certified as an Energy Star compliant unit will it retain its certification if modifications to the core model tested are changed? (gas type, chrome plated griddle plate, burner modification for deep or shallow depth unit, orificed for high altitude. (e.g. lab testing documents that chrome plating a griddle surface improves the idle efficiency rate but decreases the heavy load cooking efficiency rate.) How will this be accommodated?

Do we need a separate standard for alternate cooking surfaces used in griddles?

Compliance – how do we insure that units being shipped into the field meet the certification standard?

The customer needs to have some confidence in the repeatability of the testing and the test facilities. Who will be doing this work and who will insure that all test facilities are audited for best practices? (If we sent a unit to Piedmont Gas, FSTC and Gas Consultants and had all facilities test to the ASTM standard – what is your confidence that they would all come up with the same results?) What is the acceptable standard of deviation in the test method?

If only the top 25% of Energy Star compliant griddle units will have the right to display the Energy Star seal should there be a limit to the number of models any single company may list?

Use of the Energy Star label or implying that a product is Energy Star compliant because a manufacturer is a Energy Star Partner is already causing confusion.