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

April 10, 2009

Christopher Kent
c/o Rebecca Duff, ICF
ENERGY STAR Program Manager
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 Ovens (Draft 2). The Committee values ENERGY STAR's responsiveness to its comments during the Draft 1 comment period and subsequent investigations. The Committee offers comments on four aspects of the specification, which are outlined below.

Specification Scope & Product Categorization

The Committee supports ENERGY STAR's stated direction in these areas:

1. Excluding product categories, including rack ovens, and product subcategories, including countertop convection ovens and half-size gas convection ovens, for which there is not sufficient test data or product differentiation based upon energy performance. When there is sufficient data and a basis to differentiate, the Committee is interested in exploring specifications for these categories or subcategories.
2. ENERGY STAR's organization of the convection oven category into full-size and half-size subcategories. Since Draft 1, ENERGY STAR has provided sufficient analysis to the Committee to demonstrate that there is a solid basis for this categorization (as opposed to organizing convection ovens by volume or production capacity). Please refer to the Committee's specific suggestions to refine the full- and half-size definitions in number 3 of the "Specification Definitions" in this comment letter.

Convection Oven Energy Efficiency Levels

The Committee requests that ENERGY STAR share the masked data set used to develop the specifications so that it can fully evaluate the convection oven efficiency levels and how well the data set represents the full range of energy performance in the current marketplace.

Specification Definitions

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

1. The Committee requests further clarification of the scope of the convection oven definition and eligibility for certain types of ovens.
 - a. It is unclear if convection ovens that have the capability to inject small amounts of steam into the cooking cavity to enhance the end product, but that are not capable of completely heating the cavity with steam alone, are covered by the convection oven or combination oven definition.
 - b. It is unclear if convection oven models with *optional* steam and/or cook and hold capabilities are eligible for qualification under the convection oven specifications.
2. The Committee supports the modifications to the full- and half-size convection oven definitions to include minimum pan capacity requirements to ensure the specification is applied as intended. We suggest further refinement of these definitions to include a nominal spacing required between pans to ensure a level playing field among units with differing pan spacing. ENERGY STAR may want to consider adding language such as, “based on nominal two-inch spacing between pans” at the end of each bulleted definition in part C. Alternately, ENERGY STAR may want to consider establishing a volume requirement. In addition, the Committee recommends separating the definition of full- and half-size ovens from the convection oven definition so that these definitions can be used in conjunction with other oven types, such as combination ovens, when applicable.
3. The Committee suggests 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 represent potential sources for these definitions.

Testing and Reporting

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

1. In the comment section, ENERGY STAR states that a signed test report must be submitted with Qualified Product Information forms; however, this requirement is not stated within the text of the specification. The Committee recommends that this requirement be made explicit in the text of the specification.
2. The Committee requests additional information regarding testing and reporting requirements related to door and control options. It is not clear whether manufacturers will need to test each available door and control option configuration to qualify by product and configuration or if by testing only the least efficient configuration they may qualify all configuration types. If ENERGY STAR’s intent is to allow testing of only the least efficient configuration, it is not clear how the tested configuration will be identified and verified as the least efficient configuration within the product family. The Committee also recommends that all model numbers and the corresponding control and door options for each member of a product family be explicitly listed in the qualified products list.

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

Sincerely,



Marc Hoffman
Executive Director