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

May 6, 2009

Christopher Kent
c/o Rebecca Duff, ICF
ENERGY STAR Program Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
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 (Final Draft). The Commercial Kitchens Committee (the Committee) appreciates that ENERGY STAR recently shared the masked data set that forms the basis for the energy performance levels in this specification.

Due to the limited amount of time provided by the EPA (seven business days) to analyze these data and fully understand the basis for the energy performance levels, the Committee cannot support the performance levels at this time. The Committee requests that ENERGY STAR delay finalization of the specification for 30 days, which would provide the necessary time to convene the committee, review the data set and provide consensus-based efficiency program feedback. This delay would allow the Committee to assist EPA in identifying specification levels that efficiency programs have confidence in and will subsequently support in their programs.

The Committee recognizes that ENERGY STAR aims to finalize the specification in time for the National Restaurant Association show to take advantage of the promotional opportunity the show provides. However, we believe having sufficient time to ensure the performance levels are right and protecting the integrity of the ENERGY STAR Program should take precedence over an outreach opportunity that might lead to greater exposure of an improper performance level.

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

Sincerely,

Marc Hoffman
Executive Director