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## **Comments to EPA on Energy Star® Program Requirements for Commercial Ovens Specification Draft 1.**

January 30, 2009

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To Rachel Schmeltz:

CEE appreciates the opportunity to provide comments on the ENERGY STAR specification for Commercial Ovens (Draft 1). The CEE Commercial Kitchens Committee (the Committee) recognizes the importance of having a meaningful label to enable effective promotion of energy efficient commercial foodservice products. The following comments were developed by the Committee to help support the development of a representative and meaningful specification that identifies energy efficient commercial ovens.

### Specification Scope

The Committee supports the concept of waiting until there is a sufficient basis to include different categories of ovens in the Program, including industry supported test methods and sufficiently robust data sets to develop meaningful specifications. For these reasons, the Committee supports EPA's decision to exclude the combination, conveyor, and rotisserie oven categories from the specification.

The Committee does not find a sufficient basis for including rack ovens as the data set is extremely limited at this time. More specifically:

- There is no data for gas-powered, single rack ovens;
- There is no data for any size electric rack ovens; and
- It is not clear how many data points are available for gas-powered double rack ovens and what percentage of that market the current data set represents.

The Committee recommends that ENERGY STAR proceed with this category only when a sufficient data set exists to support the development of a robust, representative specification.

### Convection Ovens

The Committee has identified a number of challenges to specification development for convection ovens. The Committee requests that EPA consider the following in development of subsequent drafts:

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- *Unique source data characteristics.* Most, if not all, of the convection ovens data set is made up of units tested to qualify for California energy efficiency program specifications. Given the purpose of the testing, it is possible that the current data set reflects the top equipment performers rather than the entire convection ovens market. The Committee requests that EPA verify that the current data set is representative of efficiency levels across the entire market.
- *Basis for developing convection oven subcategories.* Within each of the convection oven subcategories, full size and half size, that EPA established there are significant volumetric variations. The Committee requests that EPA further investigate the impact of volumetric variations on energy performance within each subcategory and provide its basis for why pan size (full/half) is a meaningful differentiator.
- *Basis for half-size, gas convection ovens.* The Committee is aware of limited efficiency data to develop a meaningful specification for this subcategory (as defined in the current specification). As mentioned in the Specification Scope section of this letter, the Committee requests that EPA proceed with specification development for products only when a sufficient data set and energy savings potential exists to support the development of a robust, representative specification.

### Definitions

For all oven categories addressed by ENERGY STAR, the Committee recommends use of the standard product definitions used by the American Society for Testing and Materials (ASTM) in their test methods or requests EPA's rationale and definitions for exceptions.

### Specification Development Process

For some of the product categories proposed by this draft CEE notes a change in ENERGY STAR's approach to specification development. Historically, CEE has observed the gathering and analysis of sufficient data prior to release of a first draft specification. For some of the ovens subcategories, EPA released draft specifications prior to having robust, representative data sets. CEE requests an explanation of the rationale for this approach.

Once again, CEE would like to thank the EPA for the opportunity to comment on the ENERGY STAR specification for Commercial Ovens (Draft 1). Please contact CEE Program Manager, Kim Erickson, at 617-589-3949, ext. 234 with any questions about these comments.

Sincerely,



Marc Hoffman  
Executive Director