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## **Comments to EPA on Commercial Ice Machine Specification Draft 1.**

April 26, 2007

Rachel Schmeltz  
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 Rachel:

CEE appreciates the opportunity to provide comments on the ENERGY STAR specification for commercial Ice Machines (Draft 1). This draft was reviewed by the CEE Commercial Kitchens Committee (the Committee) which includes CEE members that administer energy-efficiency programs as well as program administrators from sponsoring water agencies. The Committee recognizes the impact that ENERGY STAR® has on the promotion of efficient products in the industry and applauds its efforts in addressing products that not only save energy but water as well.

The Committee was pleased to see this specification align with our current Tier 2 which will most likely become our Tier 1 in January of 2008. We support the current specification as put forth on Wednesday, March 28, 2007. The following comments address our concerns related to water-cooled ice machines.

### *Water-Cooled Ice Machines*

The Committee discussed at length the issue of water-cooled units. Some members are supportive of ENERGY STAR excluding water-cooled units and were extremely pleased to see this action on behalf of EPA. However, there are some members who were interested in the acknowledgement that water-cooled units on a closed loop system can still provide substantial energy savings without wasting water as seen with once-through cooling. We would like to recommend that EPA provide guidance to consumers on where it may or may not be appropriate to specify a water-cooled ice machine. By not ignoring water-cooled machines, EPA would be providing appropriate advice and not creating a lost opportunity when consumers consider replacing water-cooled machines. We offer our assistance to work with you and industry to find an appropriate way to do this.

Once again, CEE would like to thank the EPA for the opportunity to comment on the draft ENERGY STAR commercial Ice Machines specification. We urge that EPA adopt this specification with the additional guidance on closed-loop system, water-cooled machines as soon as possible. These comments are also endorsed by the Supporting Organizations below. Please contact CEE Program Manager, Afroz Khan, at 617-589-3949, ext. 208 with any questions about these comments.

Sincerely,

**CONSORTIUM FOR ENERGY EFFICIENCY**

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Marc Hoffman  
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