

**Steering Committee for Water Efficient Products**  
**1001 Connecticut Avenue, NW Suite 801**  
**Washington, DC 20036**

April 26, 2007

Ms. Rachel Schmeltz  
Energy Star Program Manager  
Office of Air & Radiation  
US Environmental Protection Agency  
Washington, D.C. 20460

Re: Draft Specification for Ice Machines

Dear Ms. Schmeltz:

We co-chair a steering committee formed from over one hundred organizations, companies, and water utilities that support the voluntary water-efficient product labeling programs administered by the U.S. Environmental Protection Agency (EPA). Thank you for the opportunity to provide comments on the Draft Energy Star Specification for Ice Machines.

**1. We support the exclusion of water-cooled ice machines from the Draft Energy Star Specification.** Water-cooled ice machines have embedded energy, water, and sewer costs that should not be acceptable in a product labeled for premium performance. Even water-cooled machines operating with remote evaporative cooling consume substantially more water than air-cooled machines and simply transfer the additional water consumption of the product to central systems. What's more, products that may be shipped or labeled for operation with recirculating cooling systems are easily field-adjustable to operate on a once-through basis. Many communities have banned once-through cooling systems as part of their water efficiency programs or water waste ordinances. We see no compelling need for an Energy Star label for water-cooled ice machines, since water-efficient operation of the product cannot be ensured through the Energy Star specification process. We support the Draft 1 proposal in this respect.

2. In light of ice machine model revisions that are being made by manufacturers in response to the minimum efficiency standards that will go into effect January 1, 2010, we recommend that EPA give notice of its intent to consider revising the performance criteria contained Draft 1 to coincide with the minimum standards' 2010 effective date.

Ice machines offer an important opportunity for energy and water savings. We look forward to a final Version 1.0 Energy Star ice machine specification that will

delineate premium performance for both energy and water consumption. Thank you for your attention to these views.

Sincerely,



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