

Rebecca, thank you very much for this opportunity to comment on the draft Energy STAR Ice Machine specifications. As a wholesale water supplier to governments in the Tampa Bay region, we supply water to over 2.4 million people. Our water demand management activities include tracking these types of efforts for potential impacts on water use in the region, providing water efficiency leadership for utilities through the Florida Section American Water Works Association (FSAWWA) that provide water to much of the over 15 million residents in Florida, and active participation in a number of national and international coordinated water efficiency efforts. We have reviewed the specifications and provide you with the following comments:

1. It is our understanding that EPA's Energy Star and Water Sense programs are being coordinated and appreciate water efficiency advocates ability to comment and affect standards to the benefit of our customers throughout the country. We encourage further program coordination in developing specification standards and development of market outreach strategies.
2. We strongly support the preclusion of water cooled equipment in the Ice Machine specification, as specifically defined in the draft specification. We believe that EPA is providing the type of coordination that water and energy efficiency advocates can support in this and other standards development processes in the future. Additionally field experience language defining this preclusion, provide a clear explanation of how product standards can positively and negatively affect consumers in the application of technology in actual practice.
3. It appears that crushed ice machines were not included in this or future Specs? If they were not, some rationale why they weren't included in the specification would be appreciated.

Again, thank you for this opportunity to comment and support the development of this specification.

Dave Bracciano
Chair, Water Use Efficiency Division, FSAWWA
Chair, Water Efficiency Technologies Committee, AWWA Water Conservation Division
Vice- Chair, Alliance for Water Efficiency
Demand Management Coordinator
Tampa Bay Water