



March 30, 2011

Mr. Christopher Kent, U.S Environmental Protection Agency:

Henny Penny would like to submit the following comments in response to the Final Draft: Version 2.0, Product Specification for Commercial Fryers released on March 18, 2011.

When considering the new definitions outlined in this proposed specification, we acknowledge that some of our fryers are going to be denied the opportunity to gain Energy Star status once Version 2.0 becomes effective later this year. The combination of vat width and shortening capacity limitations leave certain models outside of this scope altogether. For example, consider a model that incorporates a vat width of 14 inches and a shortening capacity of 65 lbs. According to the new definition of a Standard Fryer, the EPA is denying the manufacturer an opportunity to submit this model for qualification simply because it holds too much shortening. We would be interested to know why the program feels that an upper limit is needed for shortening capacity. It seems these definitions need to be opened up in a way that doesn't create gaps, leaving models out of contention no matter how efficient they might be. Our proposal is to either increase or remove the upper limit for shortening capacity. It should be noted that our intent is not to gain any kind of unfair advantage over other models that fall under this classification. In fact, it seems quite the opposite since efficiency performance is more challenging for models having higher shortening volumes.

In summary, Henny Penny feels this specification needs to be more inclusive so that models falling in-between the new Standard Fryer and Large Vat Fryer definitions are at least given the opportunity to qualify for Energy Star status.

I can be reached by phone at (937) 456-8689 or by e-mail at jredick@hennypenny.com if you have any questions relating to these comments.

Sincerely,

John Redick
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Henny Penny Corporation