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Mr. Chris Kent, U.S. EPA  
 ENERGY STAR® Product Specification Development

Re: Suggested Changes to Final Draft ENERGY STAR® Version 2.0 Commercial Fryers specification

Thank you for the opportunity to submit comments on the Energy Star Version 2.0 Commercial Fryer specification. As a two-time Energy Star Partner of the Year, Manitowoc Foodservice and our Frymaster brand support the establishment of new categories within the Commercial Equipment areas, and the enhancement of Energy Star guidelines. We strongly feel that such actions create value for commercial equipment users while contributing to our national energy and sustainability agendas.

With regard to the Version 2.0 Commercial Fryers Specification, we offer the following input and recommendations for consideration. We request your careful review of these suggested changes and the background, and look forward to your favorable decision:

**Definitions, 1-A-a, line 18:** We would recommend and request that the minimum measurement is revised to ≥ 12-inches, from 14-inches as proposed.

**Scope, 2-B, line 47:** We would recommend and request that the reference to minimum measurement is changed to <12 inches wide, from the <14 inches as proposed.

**Background:**

We observe that the proposed establishment of a new minimum fry pot width has evolved as a direct result of creation of the new “large vat” category, which would extend the benefit of the Energy Star program for equipment owners. We fully support this initiative.

We understand that the primary purpose of establishing proposed minimum width criteria for “standard fryers” is to clearly define between the existing standard versus new, large vat categories since idle rate requirements varied between the two categories. We further understand that Energy Star has selected the proposed 14-inch minimum with the understanding that nominal 14 inch fryers were typical of standard fryer design.

We fully support the refinement of the standard and the improved measurement definition to produce more comparable test results within the categories. However, we fear that this dimensional change will have the unintended consequence of disqualifying many Energy Star-rated fryers on the market today. This disqualification will occur despite the fact that they meet all energy performance measures as outlined in Version 2.0. They will be disqualified solely on the new interpretation of the dimensional standard.

- |             |            |                      |                     |            |            |
|-------------|------------|----------------------|---------------------|------------|------------|
| Cleveland   | Frymaster® | Kolpak®              | Manitowoc® Ice      | Merco®     | Servend®   |
| Convotherm® | Garland®   | Kysor Panel Systems® | Manitowoc® Beverage | Merrychef® | US Range   |
| Dean®       | Harford    | Kysor/Warren®        | Systems             | Multiplex® | Varimixer® |
| Delfield®   | Jackson    | Lincoln              | McCall®             | RDI        |            |

The publication of current Energy Star qualified fryers lists fryers from multiple manufacturers with width measurements between 13 and 16 inches. However, there is no definition of that dimensional element. Thus the width dimension currently may be used to describe the fry pot size, the cooking area size, or the external dimension of the fryer itself.

The complication arises when in Version 2.0, Section 3) Qualification Criteria – A. Determining Fry Pot Size - the standard is set as an internal dimension. Many of the current Energy Star-rated fryers classified as 14” generic fryer sizes are in fact slightly smaller when measuring internal dimension.

It is this measurement definition change which would result in the disqualifications as noted above. We are submitting the current listing of Energy Star fryers downloaded from the Energy Star website, and have highlighted those specific fryers from multiple manufacturers that would certainly be disqualified. As noted, there may be others which would be disqualified as various definitions were used previously to interpret the 14-inch measurement.

**Industry and Customer Impact:**

There are several major chain customers which have been supporting and buying Energy Star fryers from the start of the program. Many of these customers have changed their operation to utilize low-oil volume fryers, which have greatly reduced the oil used in each fry pot. With less oil, less energy is used for cooking and idle periods. And with less oil, the sizes of the fry pots have been reduced. However, the restriction of  $\geq 14$  inches as an internal fry pot measurement will eliminate many of their approved fryers from the qualified products list. This would have direct and potentially negative operational and purchasing impacts on similar chains and other multi-unit foodservice operators within the United States. This would occur at a time when many of these customers have implemented sustainability initiatives directly linked to procurement of Energy Star rated equipment in categories where available.

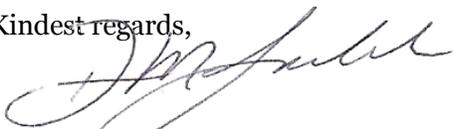
**Recommendation:**

We are recommending that EPA consider and adopt the minimum internal dimension of  $\geq 12$ -inches as the new standard for the “standard fryer” category. We believe the  $\geq 12$ -inch dimension has the following benefits:

- Maintains eligibility of current Energy Star fryers.
- Has no measureable or negative impact on the efficiency rating of the current fryers
- Along with the Large Vat standard of 18- $<24$  inches, establishes a common 6-inch width internal dimension range (12- $<18$  inches) for the “standard vat” category
- Creates the potential of a similar, standard “small-vat” category for the future, with a 6- $<12$ -inch fry pot measurement.

Thank you for your consideration of these comments. Our Manitowoc Foodservice and Frymaster personnel are available for further discussions as required to provide additional technical or related information.

Kindest regards,



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Senior Vice President of Marketing

Cc: Rebecca Duff, ICF