

September 8, 2011

**Mile High Equipment, LLC / Ice-O-Matic Comments on ACIM Energy Star 2.0 Draft 2 V2**

**Page 2:**

Metric Definitions J. states that the Ice Harvest Rate should be stated in multiples of 1. We believe that this would be alright for ice machines with large capacity but may lead to rounding error for smaller machines. We suggest that for Ice Makers less than 100 Lbs/Day 1 decimal place be used to reduce rounding error.

**Page 4:**

We support the use of the term “Hardness” to describe the ice content of continuous ice makers.

We also support the posting of adjusted and non-adjusted energy use for continuous type ice makers. This will allow the consumers to compare the energy consumption per pound of product produced to the energy used to produce the ice.

**Page 5:**

The use of power curves to eliminate the previous linear approach is supported. The equations proposed on this page provide challenging but realistic targets for all groups but the remote cooled continuous. The energy requirements for this group seem to be more difficult for the icemakers less than 1300 Lbs/Day when the hardness is taken into account.

**Page 6:**

We find the proposed potable water consumption rates reasonable.

We question the reason for reporting energy consumption to only 1 decimal place. The equations used to generate the allowable energy consumption use 2 decimal places and test systems now in use should be able to produce results accurate to 2 decimal places for energy consumption.

Water consumption reported to 1 decimal place would be alright because the methods used to measure water consumption are not as refined as those used for power consumption.

**Page 7:**

The use of test standard AHRI 810-2007 is supported, however, this standard may be revised in the near future and allowances should be made to test to the latest version of AHRI 810.

We also support the coordination between Energy Star and the DOE in test procedures.

Respectfully submitted,

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