

February 10, 2012

## **Mile High Equipment, LLC / Ice-O-Matic Comments on ACIM Draft Energy Star Test Method and Energy Star 2.0 Final Draft**

### **Draft Energy Star Test Method for ACIM**

#### **Section 2 Applicability**

We agree with the other attendees of the Webinar held February 2, 2012, in that Air-Cooled RCU units designed for connection to remote rack compressors should be excluded from Energy Star eligibility. The market for these machines is very small and the test methods would be very difficult to perform.

#### **Section 3 Definitions**

A definition for Variable Purge Setting is proposed to be included in the test specification. In our opinion this definition is unnecessary. Ice Machines have a number of adjustments that could affect the machine's performance. Test Specification AHRI 810 includes comments on how machines are set up for test which include these adjustments.

#### **Section 4 Test Conduct**

The note regarding testing Ice Makers for Rack Mount compressors should be removed as suggested above.

#### **Sections 5, 6, and 7 Testing**

These sections refer to 10 CFR Part 431 Subpart H for testing, 10 CFR refers to AHRI 810-2007 with addendum 1. Please just refer to AHRI 810 for the Energy Star test standard, this is an established industry recognized test used for certification. Also, please refer to the "Current Version" of AHRI 810 rather than version -2007 with addendum. This standard will soon be revised and the addendum incorporated in to the body.

### **Energy Star Program Requirements for ACIM, Version 2.0 Final Draft**

#### **Section 2, Scope**

We suggest removing the section on Ice Makers for Rack Mount as noted above.

#### **Section 5, Testing**

We support the reference to AHRI 810 and AHRAE 29 as test specifications directly rather than in reference to the DOE test specification.

Respectfully submitted,

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