

Scotsman Ice Systems believes that remote low side units designed for use with supermarket rack systems should not be part of the Energy Star program. We believe this due to the inherent testing issues as discussed during the 2/1 webinar and additionally to be consistent with the current rulemaking in progress with the DOE regarding minimum efficiency levels for ice machines. Below is an excerpt from the DOE rulemaking process:

“The Department elects to not address comments on this subject because the comments are rendered moot by the fact that the Department interprets equipment attached to supermarket racks to not meet the definition of an ice maker under EPCA. DOE understands that some high-capacity remote units are designed solely to be used with a remote condensing rack, and the commercial ice maker manufacturer does not manufacture (or purchase) condensers that could be paired with such ice-making heads. DOE notes that these units do not meet the statutory definition of an ice maker insofar as the definition states an ice maker “consists of a condensing unit and ice-making section operating as an integrated unit, with means for making and harvesting ice.” (42 U.S.C. 6311(19)(A)) DOE preliminarily has determined that rack-only remote condensing units are not ice makers under the statute and should not be included in this rulemaking.”

Thank you for your consideration,

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