

April 18, 2012

Mr. Christopher Kent
ENERGY STAR® Program Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Kent:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR Commercial Ovens Version 2 Draft 1 Specification, released by the Environmental Protection Agency (EPA) on March 9, 2012.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and eight Canadian provinces. In 2011, CEE members directed \$7.8 billion of energy efficiency program budgets in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as our national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

Underlying Data and Analysis Integral to Effective Stakeholder Engagement

We thank EPA for sharing the data set (masked), data plots, and estimates of the range of energy savings that supports the technical basis underpinning the Draft 1 specification. This information is crucial for efficiency program administrators to understand the program potential of the future specification. To support CEE and other stakeholder consideration of the next draft, we recommend that EPA conduct and share more granular energy savings and price differential

analysis¹ earlier in the comment process. Having these data made available with the release of the draft specifications would improve our ability to provide EPA with fully informed and timely comments. To enable efficiency program administrators to have a better indication of high efficiency product availability in the market, we recommend that EPA disclose: 1) the number of manufacturers producing qualifying products based on the proposed criteria and 2) the percentage of manufacturers offering qualifying products based on the proposed criteria as a function of the total number of manufacturers.

Technical Comments

Our analysis of the Draft 1 specification reveals that an unintended consequence of the proposed approach is that some combination ovens that would not qualify based on the current criteria consume less energy than a comparable baseline qualifying model. Therefore we cannot support the current approach.

We would support an approach for combination ovens that achieves an energy consumption metric that allows for a consistent means to identify combination ovens that consume less energy. The next section discusses findings from our analysis and provides some potential alternatives for EPA consideration in the next draft.

Our analysis also reveals that two out of 14 combination oven manufacturers produce ovens that meet the proposed criteria. Based on our understanding of the supply chain for this product, which we elaborate upon below, the outcome will likely result in limited ENERGY STAR product availability and choice for some end users and local efficiency programs. We would support an approach that achieves a better balance of product efficiency and market availability of energy efficient products.

Revisit Current Approach Due to Unintended Consequence for Efficiency

We are concerned that the proposed approach does not reliably and consistently identify energy efficient combination ovens. The Draft 1 specification requires qualifying combination ovens to meet four energy performance criteria: steam mode cooking energy efficiency, steam mode idle energy rate, convection mode cooking energy efficiency, and convection mode idle energy rate.

¹ For energy savings, more granular analysis would include energy consumption estimates for baseline and qualifying ovens for different size and use assumptions, as opposed to a general and very wide range of potential energy savings for qualifying versus non-qualifying ovens. For price differential analysis, more granular analysis would include not only the typical comparison EPA does of one or two qualifying models with one or two non-qualifying models but also the mean, median, and range of prices for qualifying and non-qualifying models in the data set. This analysis would ideally be made available in conjunction with each proposed draft specification.

Based on our analysis, an unintended consequence of this approach is that some combination ovens that would not qualify based on the current criteria consume less energy than a comparable baseline qualifying model.² One reason for this unintended consequence is that a given model may achieve significantly better performance in one or more operational modes yet not achieve the proposed performance criteria across all modes. Energy efficiency program goals revolve around energy savings as opposed to increasing the efficiency of products in specific operating modes with uncertain impact on annual energy consumption and savings. Therefore we cannot support the current approach.

We would support an approach for combination ovens that achieves an energy consumption metric that allows for a consistent means to identify combination ovens that consume less energy. While CEE does not have a preferred approach to recommend at this time, we encourage EPA to investigate two alternative approaches identified by the CEE Commercial Kitchens Committee: 1) a modeled or measured daily energy consumption metric (kWh, therms) that could also include a reporting requirement for energy performance of ovens in different modes; and 2) a modeled or measured daily energy consumption metric with minimum criteria (efficiency floors) for one or more of the four operating modes. We look forward to working with EPA and the industry to understand the relative advantages and disadvantages of these or other approaches throughout the specification development process.

Provide More Information About Expected Product Availability

Analysis conducted by the Pacific Gas and Electric Company Food Service Technology Center (FSTC) reveals that two combination oven manufacturers have products that would meet the proposed Draft 1 specification levels.³ Our understanding of the market supply chain is that

²CEE simulated this scenario by estimating the energy consumption of each combination oven model in the data set as well as the maximum allowable estimated energy consumption of qualifying combination ovens (herein baseline qualifying ovens) of different sizes using the FSTC Combination Oven Life-Cycle calculator. Maintaining constant all inputs at the calculator default values except for the four energy performance criteria included in the Draft 1 specification and the number of pans, CEE entered the energy performance and pan data for each model in the data set and baseline qualifying ovens of the same sizes to obtain annual energy consumption estimates for each unit. Based on this analysis, there are five gas combination ovens and six electric combination ovens that do not meet the Draft 1 requirements that consume less energy than the baseline qualifying models of the same sizes. The estimated energy consumption of these models ranges from one percent less than baseline qualifying ovens to more than 25 percent less than baseline qualifying ovens.

³ The data set EPA shared with CEE did not identify manufacturers for each model, so CEE was unable to independently verify this.

equipment distributors usually offer a select and limited number of manufacturer product lines. To justify a local rebate or incentive program for high efficiency equipment, local program administrators usually must demonstrate that there are multiple manufacturers with high efficiency products available locally. With just two manufacturer product lines meeting the proposed specification requirements overall, it is likely that some efficiency programs will encounter challenges in supporting a program offering. We would support an approach that achieves a better balance of product efficiency and market availability. To that end we encourage EPA to share its analysis of the number and percentage of manufacturers that meet each subsequent draft specification so that our members can conduct due diligence with respect to whether the expected energy savings combined with high efficiency product availability (among other factors) enables them to justify combination oven offerings based on the ENERGY STAR specification.

CEE would once again like to thank EPA for the opportunity to comment on the ENERGY STAR specification for Commercial Ovens, Version 2, Draft 1. Please contact CEE Program Manager Kim Erickson at 617-532-0026 with any questions about these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski".

Ed Wisniewski
Executive Director