

July 15, 2010

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:

CEE is the binational organization of energy efficiency program administrators, whose members are responsible for ratepayer-funded efficiency programs in 43 states and 8 Canadian provinces. In 2009, CEE members' budgets represented over 88 percent of the total \$6.1 billion in state- and province-authorized program budgets. In short, CEE members actively work to make ENERGY STAR the relevant platform for energy efficiency across North America.

The following comments were developed by the CEE Commercial Kitchens Committee (the Committee) in response to the ENERGY STAR specification for Commercial Hot Food Holding Cabinets (HFHCs), Version 2, Draft 3. The Committee's comments address the three topics for which ENERGY STAR requested feedback in the cover memo: large banquet carts, testing and qualification of product families, and adoption of the new ASTM test standard.

CEE would like to commend and thank EPA for raising and making us aware of the concerns related to these three topics, its efforts to gather additional data to develop a stronger technical basis to define a solid path forward, and for providing details and context around each of the topics.

Large Banquet Cabinets

EPA requested feedback on options for addressing banquet cabinets larger than 55 cubic feet given the limited data set currently available for these units (despite multiple EPA data requests). The options EPA included as pathways were: excluding cabinets larger than 55 cubic feet; adding

a consumption cap for units larger than 55 cubic feet; or extrapolating a performance level for these units based on the data set for the larger than 28 cubic feet category (maintaining the slope of that curve). EPA expressed a preference for the third option to allow manufacturers the opportunity to design and qualify highly efficient larger units and reduce confusion in the marketplace.

The Committee thanks EPA for its transparency in bringing to light the lack of data for a subset of the size category proposed in the Draft 2 specification. The Committee would like to support EPA's preferred option that would allow larger than 55 cubic feet units to qualify at a performance level extrapolated from the larger than 28 cubic feet category data set; however, we do not have data to offer that would provide sufficient technical basis to do so. The Committee encourages EPA to continue to seek additional data or, in the absence of sufficient data to ensure to the approach taken is consistent with the ENERGY STAR brand tenets, potentially seeking proxies such as independent expert analysis. The Committee requests that EPA provide the technical basis, including a description of the knowledge and experience drawn upon in any expert analysis, for the approach it takes in the next Draft.

Testing and Qualification of Product Families

EPA requested feedback on the current proposal that would require separate testing for models with differences in cabinet size within any given model family but would allow flexibility regarding model variations represented by the tested unit. Under this approach EPA would accept data that is representative of the most energy consumptive design at any one cabinet size within a given product family.

The Committee's primary objective is to ensure that product energy performance data is submitted for each cabinet size. The Committee needs this level of product data to effectively quantify energy savings and administer voluntary programs that support purchases of highly efficient hot food holding cabinets. The current EPA proposal would meet the Committee needs as long as a qualified engineer with expertise in product design or appropriate certification body is responsible for determining the most consumptive unit in a family and representing the test results.

The Committee requests that EPA provide additional information regarding what party is responsible for ensuring that the most energy consumptive model in a product family has been tested and that all products represented in that product family are based on the same fundamental design.

Adoption of New ASTM Test Standard

EPA requested feedback on a requirement that manufacturers apply a new ASTM test method to test and qualify products under the proposed specification. The new test method is scheduled to be on the ASTM F26 Main Committee ballot this summer and the Committee understands that, pending approval, the new test method will be finalized in October of this year.

The Committee once again thanks EPA for bringing to light new information and for considering this information in the revision process. The Committee does not have the technical expertise to comment on the proposed revision to ASTM test standard nor is the Committee familiar with the opinions of industry partners regarding the proposed revisions. The Committee supports the pursuit of better quality data and making use of the best industry standards available. To better understand the potential impacts of the proposed change, the Committee requests additional information regarding the potential magnitude and direction of impacts on reported product energy performance under the new test procedure.

CEE thanks EPA for the opportunity to comment on the ENERGY STAR specification for Commercial HFHCs, Version 2, Draft 3. Please contact CEE Program Manager Kim Erickson at 617-337-9280 with any questions about these comments.

Sincerely,



Marc Hoffman
Executive Director