Consortium for Energy Efficiency
98 N. Washington St., Suite 101
Boston, MA 02114
617.589.3949
www.cee1.org

February 11, 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 appreciates the opportunity to provide comments on the ENERGY STAR specification for Commercial Hot Food Holding Cabinets (HFHCs), Version 2, Draft 1. CEE is the binational organization of energy efficiency program administrators, whose members are responsible for ratepayer-funded efficiency programs in 41 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). The Committee's comments address each of the major subsections of the ENERGY STAR specification (definitions, qualifying products, efficiency criteria, test criteria, effective date).

Definitions

The Committee supports the inclusion of full glass door products as well as non-glass transparent door products as long as they meet all of the ENERGY STAR program and performance requirements. The Committee recommends modifying the proposed definition to include these units.

Qualifying Products

The Committee recommends that ENERGY STAR withhold judgment on a specification that allows qualification of dual function proofers/HFHCs until an appropriate test method is identified.

It is the Committee's understanding that consumption is not adequately measured and verified using the HFHC test method. The Committee supports ENERGY STAR's efforts to collect additional data, based on results using appropriate test methods for dual function units, to support future development of specifications that include dual function equipment and proofing equipment.

Efficiency Criteria

The Committee supports the size categories defined by ENERGY STAR in the draft specification. The size categories are as consistent as possible with the sizes available in the market and the Committee's analysis of the data supports the need for differentiating by size. The Committee is concerned, however, that it will be difficult for customers to identify the relevant size category for a specific unit because this information is generally not listed on the HFHC or in manufacturer cut sheets. As part of the ENERGY STAR product qualification criteria, the Committee recommends that ENERGY STAR require manufacturers to report the size and energy consumption data for qualifying products on their cut sheets.

The Committee supports the proposed performance requirements with the exception of those outlined for the 0-13 ft^3 category. Based on the ENERGY STAR analysis presented at the January 26 stakeholder meeting, the percent of models that qualify in this size category is already 28% (the ENERGY STAR guidelines typically identify the top 25% of products). The specification will not become effective for another year and it is possible that the market penetration of eligible products will increase further. The Committee recommends that ENERGY STAR reconsider the proposed performance levels for this size category so that only the top 25% of products qualify at the effective date of the specification. In determining an appropriate performance level, the Committee recommends that ENERGY STAR consider past market trends such as in the percent increase of ENERGY STAR qualifying models over the course of a year (the Committee notes based on its analysis that there was a 50% increase in ENERGY STAR qualifying models from December 2008 to December 2009). In addition, the Committee recommends that ENERGY STAR consider aligning its performance levels with the CEE Tier 2 specification (20 watts/ft^3), which is a level currently promoted by seven local and regional energy efficiency programs.

The Committee would like to address concerns raised during the stakeholder call on January 26 that the product database used to develop the proposed specification is not sufficiently robust. According to ENERGY STAR market penetration data, a subset of the models contained in the database represented 79% of total shipments in 2008. In addition, from quarter 4 of 2008 to quarter 4 of 2009, the number of models meeting the Version 1.0 ENERGY STAR criteria grew by more than 50%, indicating that the current database likely represents an even higher share of total shipments at this point. Based on these factors, the Committee finds the database of product models used to develop the specification criteria sufficiently robust and recommends ENERGY

STAR move forward with the specification development process without additional calls for product data.

Test Criteria

The Committee supports the requirements for testing of individual product models instead of product families. The Committee has been made aware of and supports proposals for minor modifications to the test method to align with the National Sanitation Foundation (NSF) test requirements so long as these changes to not impact the energy consumption test results.

Effective Date

The Committee supports the suggestion made by stakeholders during the stakeholder call on January 26 to move the effective date of the specification from February 1, 2011 to January 1, 2011. This date adjustment would align with the efficiency program cycle for those program administrators that operate their efficiency programs on a calendar year.

Once again, CEE would like to thank the EPA for the opportunity to comment on the ENERGY STAR specification for Commercial HFHCs, Version 2, Draft 1. Please contact CEE Program Manager Kim Erickson at 617-337-9280 with any questions about these comments.

Sincerely,

Marc Hoffman
Executive Director