

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

November 16, 2009

Dear Hot Food Holding Cabinet Manufacturer or Other Interested Party:

With this letter, the U.S. Environmental Protection Agency (EPA) is launching the revision of the Version 1.0 ENERGY STAR specification for commercial hot food holding cabinets. The current ENERGY STAR specification for this equipment has been in place since August 2003, and market share of qualified models has been growing steadily. As of November 1, 2009, EPA has qualified over 240 products from 23 manufacturers.

To ensure that ENERGY STAR continues to represent the top performers in terms of energy efficiency, EPA will be revisiting the current ENERGY STAR specifications to determine new performance levels. This letter frames the expected scope of this revision, provides a projected timeline, and invites your participation in this revision process.

Expected Scope of Revision

Maximum Idle Energy Rate

EPA expects to focus this revision on the maximum idle energy rate to ensure that ENERGY STAR commercial hot food holding cabinets remain top performers when it comes to energy efficiency. The existing specification established a performance requirement that varied as a function of volume but was based on a single line fit of 40 watts per cubic feet. To provide similar representation of ENERGY STAR models across all size ranges, EPA is considering setting new maximum idle energy rate levels based on the following volume ranges:

- 0 – 10 cubic feet
- 10 – 25 cubic feet
- 25 cubic feet and greater

EPA understands these volume ranges generally correspond to half, large cabinet, and banquet size units. EPA is interested in gathering feedback from stakeholders on whether these three volume ranges are appropriate or if a single line fit is more appropriate.

Qualifying Products

At this time, the current specification does not cover dual function equipment, such as cook and hold appliances. EPA is interested in gathering information and data from stakeholders on these types of equipment, and other categories of hot food holding cabinets not currently covered, for possible inclusion in the revised specification.

Test Criteria

Under the current specification manufacturers may submit qualifying product information representing a family of similarly designed products (only differing in internal volume) based on testing of the smallest unit within a product family. EPA understands that the smallest units, within a product family, yield higher idle rates and thus testing and reporting on the smallest volume unit within a product family would be representative of the maximum energy consumption of any one product in that family. To align with other ENERGY STAR commercial foodservice product requirements, EPA is proposing to change this family

reporting requirement and have all products tested and reported separately to ensure consumers have access to model specific data on the qualified product list. EPA is interested in gathering feedback from stakeholders on this program change.

Data Submission for Additional Models

In determining appropriate maximum idle energy rates, EPA intends to use performance data from the database of ENERGY STAR qualified products. Manufacturers and other stakeholders are encouraged to provide EPA with performance data on non-qualified models using the attached data submission form. In addition, manufacturers are asked to provide performance data for other equipment categories, such as dual temperature equipment. Beginning with a robust data set that includes both qualified and non-qualified models will help ensure that ENERGY STAR sets the new requirements at appropriate levels that are reflective of the overall market. If you wish to submit non-qualified data, please send completed data forms to Bijit Kundu, ICF International, at bkundu@icfi.com by December 14, 2009.

EPA is also interested in obtaining broader market demographics on this product category, including the percentage of products in the market within the three size categories listed above. Stakeholders are encouraged to provide this information to EPA.

Next Steps

As EPA moves forward with revising the current requirements, EPA will solicit input from all stakeholders on an ongoing basis via draft specifications, e-mail updates, and stakeholder meetings. As a first step, EPA would like to hold a Web-based stakeholder meeting on **December 9, 2009** to gather stakeholder feedback on the issues noted above and address other stakeholder comments and questions. **Please let EPA know as soon as possible if this date is problematic for your organization.** Details of this meeting will be forthcoming. EPA intends to complete the specification revision process by May 2010. During this revision process, we expect to develop multiple drafts of the specification which will provide several opportunities for partners to provide us comments on the efficiency levels and program requirements.

All EPA correspondence and specification documents will be posted throughout the revision process to the ENERGY STAR Product Development Web site at www.energystar.gov/productdevelopment (click on "Revisions to Existing Product Specifications" and then select "Hot Food Holding Cabinets"). In addition, all written comments received by EPA will be posted, with permission from the commenter, to the same site.

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. Your input is very valuable during this specification review process. If you are not familiar with the ENERGY STAR Guiding Principles, you are encouraged to review them at www.energystar.gov/productdevelopment. In addition, please feel free to contact me at (202) 343-9046 or kent.christopher@epa.gov with any questions or comments.

Thank you for your continued support of ENERGY STAR. I look forward to working with you during the specification revision process.

Sincerely,



Christopher Kent, U.S. EPA
ENERGY STAR Product Specification Development