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September 4, 2003

Ms. Rachel Schmeltz  
Energy Star Program  
U.S. Environmental Protection Agency  
Washington, DC

SENT VIA EMAIL

Dear Rachael,

I am writing to provide the comments of the American Council for an Energy-Efficient Economy (ACEEE) on the Draft 1 Energy Star specification for Refrigerated Beverage Vending Machines. I am sorry these comments are late, but I was out of the office for much of August and am just now catching up.

ACEEE is fully supportive of the Draft 1 specification and urges that it be finalized as soon as possible. The Tier I specification captures performance that is a significant improvement relative to equipment sold a few years ago. Manufacturers have made a lot of progress improving equipment efficiency, and it is appropriate to recognize equipment meeting this specification with an Energy Star label.

However, as a result of recent product introductions in anticipation of this new specification, most equipment now on the market meets this specification, and so it is appropriate to have a Tier II specification go into effect in about two years time. Our understanding from discussions with beverage and vending machine manufacturers is that the 10% additional savings are achievable, although achieving these savings may raise costs somewhat. Furthermore, Coke is on record as having a goal of achieving 40-50% savings for this equipment relative to a baseline that is more efficient than the CSA standard. While we do not know the details of the Coke baseline, from the data we have seen, the Tier II specification should be in the same "ballpark" as the Coke goal.

Furthermore, while we support the Tier II specification, we are open to having EPA review this specification in early 2005, prior to it taking effect, just as EPA has sometimes reviewed other Tier II specifications that are set in advance.

We also wish to comment on a few other issues that we understand have been raised:

*Glass front machines:* Glass front machines should be eligible for the Energy Star label, based on the current draft specification. Before considering a separate category for these

units, test data on these units need to be compiled. This will take time, so we recommend that this be done later, without delaying the finalization of the current spec. In addition, if data on glass front units indicate that it will be difficult for glass front units to meet the draft 1 spec, EPA should ascertain that the glass front feature serves important purposes that justify the additional energy use before establishing a less stringent Energy Star spec for these units.

*Remanufactured machines.* The topic of remanufactured machines was discussed in a conference call of interested parties convened by Energy Star and the consensus was not to pursue remanufactured machines at this time. Remanufactured machines can be considered later if there is sufficient interest by market participants.

*Test procedure.* The current version of the ASHRAE test procedure should be used. ASHRAE is now revising this test procedure, but according to the Chair of this ASHRAE committee, this revision will not be completed until spring 2004 at the earliest, and possibly later. Energy Star should not wait for completion of the revised test procedure but should instead proceed based on the existing procedure.

Please let me know if you have any questions about these comments. We wish you good luck in finalizing this specification and stand ready to work with you to promote it once it is finalized.

Sincerely,

Steven Nadel  
Executive Director