

Comments to EPA on Energy Star Proposal for Vending Machines

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To: Rachel Schmeltz

From: Michael Martin

General Comments

Your meeting in Atlanta on October 22, 2002 was very productive. Clearly many of the participants had little knowledge of the details of Energy Star programs, the Consortium for Energy Efficiency, nor the practice of incentives to encourage market transformation. As a result, my comments to you have two purposes; first to offer encouragement and suggest improvements to the Energy Star proposal, and second, to rebut several statements by potential participants in the program.

Scope of the Program

Manufacturers of vending machines that comply with the two EPA proposed eligibility criteria should be allowed to participate, whether vending machines are new or rebuilt, and whether they are of conventional design or designed to dispense perishable beverages such as milk. We recognize that it may sometimes be more difficult to make rebuilt vending machines or vending machine that that can safely handle perishable beverages more efficient, but if they achieve the performance level specified in your eligibility criteria, they should not be penalized by excluding them from the scope of your program. On the other hand, they should no be given a lower benchmark to achieve either.

Reduction of Stringency

There were several suggestions about making special concessions for reconditioned machines or machines that are capable of dispensing perishable beverages. Those making such suggestions fail to realize that if the Energy Star eligibility criteria are reduced, likelihood of incentive payments to purchasers of Energy Star machines decreases. Utilities and others don't pay incentives merely to have Energy Star stickers on the machines, but to reduce energy consumption and peak demand. Those who award incentive payments don't follow Energy Star specifications blindly. Nor does the Federal

Energy Management Program which advises federal and many other purchasing agents on what energy using equipment they should purchase.

What is the Standard Product?

ANSI/ASHRAE 32.1-1977 classifies the capacity of machines in terms of the number of 12-ounce cans or 8 ounce bottles that the machine can vend without reloading. The committee that I chair, that is revising the standard, chose to classify the capacity of machines in term of 12-ounce cans only. We support EPA's proposal to do the same. It is our experience and those of my committee, that although many machines are able to dispense bottles or other packages in a variety of sizes, virtually every machine is capable of dispensing 12 ounce cans and can be tested using 12 ounce cans.

Vendible Capacity

We suggest that you use the term "vendible capacity" to describe the capacity of the machine and that you define vendible capacity as follows:

"Vendible capacity" means the maximum number of 12 ounce cans that can be dispensed from one full loading of the vending machine without further reload operations when used as recommended by the manufacturer."

Low Power Mode

Several comments suggested that the eligibility criteria should not include a requirement for the ability to have a low power mode since such a mode is not always needed.

Energy Star vending machines should be the best that are on the market and should all have this capability. We believe that the inclusion of such capability is highly cost effective. We do not agree with those who suggested that machines should have a low power mode but that you should not in any way define what reduction of energy use qualifies a model as having such a mode.

Ability to Turn Off the Lights at any Time

We have noticed recently an increasing number of active vending machines operating without any display lights on. We question the common assumption by some people that consumers assume that vending machines are out of order when the display lights are not illuminated. The way to tell whether the machine is vending or not is to look at the small display on the coin box, which usually has a moving digital display showing the price of the product, the temperature of the product, or some other message. In order to have an

Energy Star label, the machine should have the capability of turning off the display lights completely all the time, while continuing to power the refrigeration equipment and vending mechanism. This should be in addition to the “low power mode”.

The Formula in the Eligibility Criteria

We have examined the limited amount of performance data that we have been able to obtain and conclude that all the manufacturers can attain the levels described by the formula. Thus the level can be justified. We expect to receive a lot more data within the next two months and would not be at all surprised if we found that an even more stringent level could be justified. We also may find that the shape and slope of the curve could be improved upon. We will provide you with additional data as we obtain it.

We appreciate the opportunity to be part of your team. Contact me if you have any questions.