



April 6, 2006

Rebecca Duff – ICF Consulting
Rachel Schmeltz – EPA ENERGY STAR

Re: NRDC Comments on Rebuilt Vending Machine Specification - Draft 2

On behalf of NRDC's more than 600,000 members, we provide these written comments to express our strong support for both the direction and content that EPA has included in its March 2, 2006 specification for rebuilt vending machines. NRDC was one of the lead proponents for reducing the energy use of vending machines and played a key role in the establishment of the initial ENERGY STAR specification for new vending machines.

We are pleased to see that EPA is expanding its program and has found a sensible mechanism for adding existing vending machines to its program. As you are aware, most refrigerated vending machines stay in the field for 10 or more years, and the installed stock far exceeds the annual sales of new machines. In addition, some older machines may use up to twice the annual energy as a new similar sized machine. As such it is critical to establish an energy usage target for existing machines and a means for identifying and promoting them in the market place. The "Rebuilt Machine Specification" that EPA proposes successfully meets this objective.

Below we provide the rationale as to why we support the specification and offer one recommendation to further improve the specification:

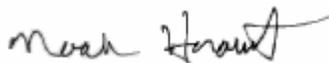
1. The specification contains the right level of stringency as it requires rebuilt machines to meet the same performance requirements as new machines.
2. We applaud EPA for requiring the machine owner/refurbishment center to require a new and discrete model number for each refurbished machine. This step will help minimize bottlers/distributors from simply slapping an ENERGY STAR label on a non energy efficient machine. In addition, the discrete model number will be appealing to utilities who might offer an incentive for complying machines as they now have a mechanism to perform on-site verification.
3. We encourage EPA to include language in its specification that a) further encourages stakeholders (site manager, bottlers, etc.) to enable the low power mode features when the machine is placed into service, and b) requires the machine owner to annually report on the % of rebuilt machines that have enabled the built-in lighting, and/or the refrigeration low power feature during the machine installation. This information is

useful as it provides a means for determining the incremental savings that have been achieved and feedback on how frequently this savings opportunity is being realized.

We appreciate the unique nature of each site in terms of its hours of operation, and machine location (indoor vs. outdoor). As such, the settings for the low power mode need to be made in the field during installation and not at the refurbishment center. For those locations that are located outdoors, the installer in consultation with the site manager may choose to have the lights go off during daylight hours, but not engage the refrigeration power saving mode. For a machine located in an office building with known extended periods of no user activity, the low power mode for both the lights and the refrigeration should be enabled. For those sites with multiple machines on-site, use of the low power mode features can provide thousands of dollars of incremental utility bill savings.

In closing we appreciate the opportunity to provide this input and are available to talk about our comments in further detail with you and other stakeholders.

Sincerely,

A handwritten signature in black ink that reads "Noah Horowitz". The signature is written in a cursive, flowing style.

Noah Horowitz
Senior Scientist
NRDC