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Comments to EPA on Energy Star® Program Requirements for Commercial Refrigerators and Freezers Specification Version 2.0 – Final Draft.

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To Chris Kent:

CEE appreciates the opportunity to provide comments on the ENERGY STAR specification for Commercial Refrigerators and Freezers (Version 2.0 – Final Draft). The Commercial Kitchens Committee (the Committee) would like to commend ENERGY STAR's efforts for addressing previous comments. ENERGY STAR has done an admirable job researching the concerns raised by the Committee and other stakeholders and developing appropriate solutions in this Final Draft specification.

The Committee supports the steps outlined by ENERGY STAR to help improve the accuracy of the product information submitted by manufacturers and the rigor of the qualified products list for commercial refrigeration. The new requirement and prescribed process for third party certification of testing laboratories balances several needs including: product submittals that contain accurate information; manageable product testing costs; and a requirement for submission of product cut sheets that can support verification of product eligibility for ENERGY STAR. The Committee also supports ENERGY STAR's plans to periodically compare the ENERGY STAR qualified products list data with that of Natural Resources Canada to maintain ongoing consistency among the product databases. The Committee suggests one additional, related measure for consideration in this specification: a requirement that test reports submitted to ENERGY STAR be signed by the test laboratory or company representative confirming the product testing results. This additional measure is consistent with the approach ENERGY STAR is considering for other commercial foodservice product categories.

The Committee supports the Final Draft energy performance levels. The relative efficiency levels for glass and solid door units are consistent with our understanding of the relative performance values for each door type. The Committee plans to explore incorporation of the ENERGY STAR efficiency levels into the CEE Commercial Kitchens Initiative.

Prior to finalization of the specification, the Committee requests two minor additions that may help minimize confusion related to how the specification applies to different types of products:

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1. Addition of definitions for vertical and chest configuration. The specification sets different efficiency levels for each configuration type; however, it is not clear how these configurations are defined or differentiated.
2. Additional clarification and/or definitions of eligible versus ineligible product types. The specification states that qualifying products must meet definitions 1.A through 1.G; however, some of the ineligible product types listed on lines 226-227 meet these definitions so it is unclear what specific characteristics are required for eligibility.

Once again, CEE would like to thank the EPA for the opportunity to comment on the ENERGY STAR specification for Commercial Refrigerators and Freezers (Version 2.0 – Final Draft). Please contact CEE Program Manager, Kim Erickson, at 617-337-9280 with any questions or follow up regarding these comments.

Sincerely,



Marc Hoffman
Executive Director