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Comments to EPA on Energy Star® Program Requirements for Commercial Refrigerators and Freezers Specification Version 2.0 - Draft 2.

September 23, 2008

Rachel Schmeltz
c/o Bijit Kundu, ICF
ENERGY STAR Program Manager
Environmental Protection Agency
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1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Rachel:

CEE appreciates the opportunity to provide comments on the ENERGY STAR specification for Commercial Refrigerators and Freezers (Version 2.0 - Draft 2). The Commercial Kitchens Committee (the Committee) recognizes the impact that ENERGY STAR has on the promotion of energy efficient products in the industry and encourages the continued development of ENERGY STAR specifications for commercial foodservice equipment. The following comments address those parts of the specification that are most relevant to the Committee in considering commercial kitchens energy efficiency program offerings.

Inclusion of Chest Units

The Committee supports extending this equipment category to support more comprehensive program offerings when there is a solid basis for doing so including: significant, national energy savings potential; cost effectiveness is thoroughly considered; market conditions permit; and current, industry-endorsed test procedures exist.

Exclusion of Ice Cream Freezers Designed to Operate at -15°F to 0°F and Laboratory Units

The Committee supports excluding ice cream freezers and laboratory units as they are not generally part of the targeted offerings within Committee members' commercial foodservice programs. Where a solid basis exists (please see criteria identified in the Chest Units section), the Committee encourages the development of specifications for these categories outside of the commercial foodservice equipment market category.

Solid and Glass Door Definitions

The Committee supports the proposed definitions for solid and glass door units.

List of Eligible Categories and Exclusion of Drawer Cabinets

The Committee supports the list of eligible categories and the exclusion of drawer cabinets at this time because industry-endorsed test methods are not currently available. Where industry-endorsed test procedures and the other criteria listed in the Chest Units section exist, the

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Committee encourages the consideration of specifications for new commercial foodservice categories.

Use of Natural Resources Canada Database

The Committee applauds ENERGY STAR's efforts to improve the accuracy of the data used to develop this specification as well as the inclusion of Canadian market data. It is extremely important for member programs that an accurate specification, representative of the United States and Canadian markets, be developed in order to successfully promote programs supporting this specification to industry stakeholders. To this end we request information about the probability that the Natural Resources Canada database is representative of the two markets as well as any underlying assumptions.

We are also concerned about the implication that the current ENERGY STAR database is lacking in product accuracy and consistency. Many CEE members run energy efficiency programs that rely upon this database. CEE requests that EPA provide information on how the ENERGY STAR Program plans to address the data quality issues in the current ENERGY STAR database and the continued accuracy and consistency of the data that will constitute the new database.

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 - Draft 2). Please contact CEE Program Manager, Kim Erickson, at 617-589-3949, ext. 234 with any questions about these comments.

Sincerely,



Marc Hoffman
Executive Director