

Continental

Refrigerator

January 7, 2009

Rachel Schmeltz, ENERGY STAR Program Manager
c/o Bijit Kundu, ICF International
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Specification for Commercial Refrigerators and Freezers, Version 2.0 Draft 3

Dear Ms. Schmeltz:

After reviewing the Draft 3 Version 2.0 specification for Commercial Refrigerators and Freezers, Continental Refrigerator, as an Energy Star Partner and stakeholder in this program, would like to submit the following comments:

Revised Definitions for Solid and Glass Door Cabinets: The definitions provided here appear to be conflicting. In the example provided (page 4 of Draft 3) pass-through units with glass on one side and a solid door on the other would be considered glass door Cabinets. But, since the door on the other side is solid, these units also meet the solid door criteria, since "50% or greater of the surface area on the front face of all outer doors on one side of the unit is solid". From the definitions provided, a unit can only be classified as Solid Door or Glass Door Cabinet. The Solid Door definition, therefore, should state: "*A refrigeration cabinet with hinged and/or sliding outer doors that does not meet the criteria for a Glass Door Cabinet.*" This would clarify the categories and eliminate possible conflicts.

Testing/Standards Organizations: ETL/Intertek should be added to the list of Testing Organizations. They are widely recognized and are accredited by agencies in the U.S. and Canada for product testing and conformance verification.

Specification for Qualifying Products - "Mixed Solid/Glass Door Equipment: This section (page 7 of Draft 3) introduces a Cabinet definition, not previously covered. In the example of a cabinet with a glass and solid door on the same side, 50% of the Doors are Solid. By definition (page 4 of Draft 3), this is a Solid Door Cabinet. If the Mixed Specification remains in effect, Cabinet definitions should be modified accordingly: Solid Door Cabinet: "*A refrigeration cabinet in which all outer doors are solid.*" Glass Door Cabinet: "*A cabinet in which all outer doors on at least one side of the unit are glass.*" An additional definition should be added for a Mixed Solid/Glass Door Cabinet: "*A cabinet in which the outer doors on at least one side of the unit are a combination of solid and glass.*" For pass-through cabinets, any compartment with a glass door on at least one side should be considered a Glass Door compartment for calculations.

Test Criteria: Data should only be accepted from test facilities that have been certified by an accreditation agency, or from approved 3rd party accredited laboratories. This would be consistent with requirements for Federal and State regulations, as well as NRCAN. It would ensure data is reliable, in support of the integrity of the Energy Star program.

Enforcement: Responsibility for policing the program should not rely solely on "whistleblowing" by other manufacturers. EPA should enforce the integrity of its database through rigorous test certification and by maintaining a high standard for partnership. If a manufacturer has multiple false claims that have been verified, the Company should be removed from the Energy Star Partner List and required to reapply after a predetermined period of time has elapsed.

Sincerely,



Jeffrey E. Bauman
Engineering Project Manager