

# *Silver King Refrigeration, Inc.*

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Silver King fully supports the EPA's efforts to improve and clarify Energy Star standards. We have carefully reviewed the proposed draft and would like to offer comments and suggestions.

Our first suggestion is to clarify energy usage measurements and reporting methods between ASHRAE 117-2002 and ASHRAE 72-2005. Under the ASHRAE 117-2002 standard total energy is measured by the unit(s) usage. Under ASHRAE 72-2005 the energy consumption measurements include the total energy, refrigeration energy and the auxiliary circuits (the anti condensate heaters, fan motors, case lights and defrost heaters). These measurements according to the ASHRAE 72-2005 must be conducted separately as one value for proper reporting instead of only measuring the total energy consumption. This adds complexity to determine total energy usage by breaking down each component rather than stating the total energy used. It will be more complex and therefore more costly for manufacturers and unnecessarily confusing to end users. The most efficient and effective way would be to continue reporting to Energy Star how much total energy a unit actually uses. My recommendation is to maintain this part of ASHRAE 117-2002 which measures total energy used by a model kWh/day.

We understand the requirement of using volume in the energy consumption calculation rather than a straight line requirement. The intention of creating a new sub category for small under counter refrigerators and freezers is going in the right direction, but does not fully address the issue. As noted by EPA, in instances where few or no models meet the specification within a certain volume range, several models with performance results close enough to the proposed levels could have small design improvements made so that these models would likely qualify.

In regards to under counter refrigerators and freezers under 7 cubic feet of volume, only 2 models claim they qualify under today's standards. One model, Blue Air, draws more amps than a Silver King freezer, but consumes less energy. The second model listed, Beverage Air UCF27AY, is not available for sale. We have been informed that the model has not yet been released from engineering to production. The point is, there are only 2 models used for creating the standard and both appear to be invalid. If no manufacturer can meet the existing standards today, they definitely will not be met after 2010.

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If the formula cannot be revised to an attainable standard, we would suggest creating a new category, perhaps adding for freezers up to 5 cubic feet and from 5 to 7 cubic feet. Under counter refrigerators and freezers have relatively small cubic volume, but use similar size components such as compressors, that are used in larger models.

I appreciate having the opportunity to express my concerns and make suggestions. If you have questions or need further explanation of my position on these points, please call me at 763-923-2531.

Regards,

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