



Stakeholder Comments to Version 2.0, ENERGY STAR® Program for Commercial Refrigerators and Freezers

September 22, 2008

Rachel Schmeltz
c/o Bijit Kundu
ENERGY STAR Product Development
U.S. Environmental Protection Agency
1310 L Street, NW
Washington, DC 20005

Dear Rachel,

The development of ENERGY STAR specifications for commercial refrigerators and freezers offers an opportunity to decrease national energy consumption significantly while providing more reliable equipment with fewer service calls.

USA Technologies is the leader in providing energy saving devices for small, self-contained refrigeration systems as typically found in vending machines and coolers. We have been producing devices since 1997 and we are an ENERGY STAR Partner.

USA Technologies' EnergyMiser® product is offered as a solution for the EPA's ENERGY STAR program for vending machines and EnergyMisers are recognized by the U.S. Department of Energy as a tool to reduce energy consumption. Independent testing laboratories, approved by national soft drink companies, confirm performance results.

More than 50 public utilities nationwide promote the use of USA Technologies' EnergyMiser energy controls through turnkey programs, rebates and similar customer incentives for vending machines and coolers.

Over 10 patents protect USA Technologies' EnergyMiser products. Hundreds of thousands are in service worldwide, saving energy while reducing CO2 emissions. USA Technologies' has several products for commercial refrigerators, including our CM2iQ which installs simply as a cold control and provides significant energy savings in addition to eliminating the freezing of the units' evaporator coils should a door be left open. Testing in our state-of-the-art environmental chamber shows savings of up to 41 percent with typical savings of 24 percent.



We believe that we can provide the latest technology to allow all commercial refrigerator and freezer manufacturers to reach the proposed ENERGY STAR levels at minimal cost. Our technology additionally creates a more reliable unit with less chance of evaporator freeze- up, a common cause of service calls.

We were successful in substantially improving vending machine energy efficiency and reliability and have had proven results with glass-front coolers. Our technology can be customized to gain the maximum efficiency from a particular refrigeration system design, while our “generic” devices provide substantial savings across the spectrum of existing designs. The use of the latest in energy management technology will allow most designs to see substantial savings.

We would like to take this opportunity to alert all interested parties that we will make our engineering staff and testing capabilities available to those manufacturers that require assistance in attaining the proposed ENERGY STAR standards.

Sincerely,

A handwritten signature in black ink that reads "Bob McGarrah". The signature is written in a cursive style with a large, prominent "B" and "M".

Bob McGarrah
Senior Energy Consultant
USA Technologies