



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

December 4, 2008

Dear Commercial Refrigeration Manufacturer or Other Industry Stakeholder:

The Environmental Protection Agency (EPA) welcomes your input on the attached **Draft 3** Version 2.0 ENERGY STAR[®] specification for Commercial Refrigerators and Freezers. This Draft 3 specification reflects comments received on the previous Draft 2 document.

Stakeholders will notice the following key changes in this latest version:

- Revised definitions for solid and glass door cabinets. Under the new definitions, cabinets that include glass covering greater than 50% of the surface area on the front face of all outer doors on one side of the unit will be considered *glass door cabinets* for purposes of ENERGY STAR qualification.
- Removal of the backsplash requirement in the worktop surface definition.
- Clarification to ANSI/NSF 7-2007 and UL-471 requirements presented in Section 2: Qualifying Products. Equipment must meet only those requirements listed in the referenced standards that apply to the particular type of equipment, based on intended application.
- Guidance on calculating Maximum Daily Energy Consumption (MDEC) Requirements for cabinets that include **both** solid and glass doors on the same side of the cabinet. This new approach proposes that the total cabinet MDEC be the sum of all individual compartment MDEC values.
- Revised MDEC requirements derived from an updated data set supplied by Natural Resources Canada, which represents product data submitted as of October 27, 2008.
- Clarification that factory-installed, manually-controlled accessories are required to be tested in the "ON" position in accordance with ANSI/ASHRAE Standard 72-2005.
- Clarification that energy management devices that are hardwired **and** cannot be adjusted by the operator may be operational during testing provided they meet the requirements outlined in the official interpretation on ANSI/ASHRAE 72-2005 (Interpretation IC 72-2005-01).
- Revised Version 2.0 effective date of December 1, 2009.

More details regarding EPA's rationale for making these changes are included in note boxes throughout the document.

In this letter, EPA would also like to address stakeholder concerns regarding: (1) the relationship between Federal standards and ENERGY STAR requirements and (2) accuracy of the current ENERGY STAR commercial refrigerator and freezer qualified product list.

Federal Standards vs. ENERGY STAR Requirements. Federal minimum efficiency standards equivalent of the current Version 1.0 ENERGY STAR levels for solid door equipment will go into effect on January 1, 2010. Minimum efficiency standards for transparent door units are also addressed in these new standards. Please refer to the October 18, 2005, Federal Register Notice, 70 FR 60407, for the Final Rule enacting Federal minimum efficiency standards for commercial refrigeration equipment: <http://edocket.access.gpo.gov/2005/pdf/05-20701.pdf>. To EPA's knowledge, the U.S. Department of Energy does not intend to revisit the Final Rule. As of January 1, 2010, all self-contained commercial refrigeration equipment, with solid or transparent doors, must meet these minimum efficiency standards to be sold in the U.S.

As typical practice, with the finalization of new Federal minimum efficiency standards that are equivalent to ENERGY STAR levels, EPA will explore revising the specification to be more stringent such that ENERGY STAR continues to represent approximately the top 25% of energy performers. In the case where a revision to the specification is not feasible, due to lack of differentiation at a level more stringent than the new minimum Federal standard or current ENERGY STAR level, EPA may choose to suspend the ENERGY STAR specification since it no longer serves its intended purpose. Based on available data, EPA found sufficient differentiation on which to base a revised ENERGY STAR commercial refrigerator and freezer specification so that it continues to represent approximately the top 25% of models available. To view the current data set and Draft 3 analysis, visit the ENERGY STAR Product Development Web site at www.energystar.gov/productdevelopment and click on "Revisions to Existing Specifications".

Accuracy of Current ENERGY STAR Qualified Product (QP) List. Some stakeholders questioned the accuracy of the data on the current ENERGY STAR commercial refrigerator and freezer QP list. In order to address this, EPA is providing guidance regarding the enabling of manually-controlled accessories during testing. Further the current data set will not be used to derive Version 2.0 requirements

Comments Submittal

Stakeholders are encouraged to provide written comments for EPA consideration to Bijit Kundu, ICF International, at bkundu@icfi.com by **January 8, 2009**. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests that their comments remain confidential.

Thank you for taking the time to review this draft specification. Please feel free to contact me directly with any questions or concerns at (202) 343-9124 or via e-mail at schmeltz.rachel@epa.gov.

Sincerely,



Rachel Schmeltz
ENERGY STAR Product Development