



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

OFFICE OF
AIR AND RADIATION

March 6, 2009

Dear Commercial Refrigeration Manufacturer or Other Industry Stakeholder:

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

Stakeholders are encouraged to provide input on the following specific changes to the Version 2.0 specification by **March 20**:

- Definitions have been revised for "solid door cabinets" and "glass door cabinets" and new definitions were added for "mixed solid/glass door cabinets", "solid door", and "glass door".
- Clarification is provided in regards to calculating Maximum Daily Energy Consumption (MDEC) requirements for mixed door cabinets.
- Modifications have been made to the MDEC requirements for solid and glass door freezer units.
- Manufacturers are required to submit test reports for ENERGY STAR qualification.
- Clarification is provided to note that any **standard** accessory, even if it is not factory-installed, should be tested installed and in the "ON" position.
- A new requirement has been added that manufacturers must use approved testing sources from the California Energy Commission and Natural Resources Canada (NRCAN) when testing for ENERGY STAR qualification.
- The date at which the Version 2.0 becomes effective has been moved to January 1, 2010. Glass door units may qualify for ENERGY STAR starting April 1, 2009.

The note boxes in the Final Draft document will be omitted in the Final specification to be distributed on April 1, 2009. Please note that EPA has also addressed stakeholder comments that did not result in a change to the specification within these note boxes.

To view the current EPA data set and Final Draft analysis, visit the ENERGY STAR Product Development Web site at www.energystar.gov/productdevelopment and click on "Revisions to Existing Specifications".

In addition, EPA would like to address stakeholder concerns regarding: (1) the relationship between Federal standards and ENERGY STAR requirements; (2) accuracy of the current ENERGY STAR commercial refrigerator and freezer qualified product list; and (3) EPA's procedure for handling mislabeled products. Although EPA has addressed these issues in the past, there appears to be lingering confusion among stakeholders.

Federal Standards vs. ENERGY STAR Requirements

Several stakeholders were concerned about the effect that the Federal minimum efficiency standard would have on their product lines. As a reminder, in 2005 Congress passed the Federal minimum efficiency standards that make current ENERGY STAR levels in Version 1.0 mandatory for all commercial refrigerators and freezers as of January 1, 2010. Please refer to the October 18, 2005, Federal Register Notice, 70 FR 60407, for the Final Rule enacting Federal minimum efficiency standards for this

equipment. If products do not meet the Federal minimum efficiency standard by January 1, 2010, they will not be allowed to be sold in the U.S. In contrast, ENERGY STAR aims to represent the top performing models in terms of energy efficiency. In setting the ENERGY STAR requirements that are to be effective in 2010, EPA cannot set the requirements such that they are the same or less stringent than the Federal levels or ENERGY STAR will no longer serve its purpose of highlighting more efficient models.

Accuracy of Current ENERGY STAR Qualified Product (QP) List

Stakeholders noted inconsistencies between data reported to ENERGY STAR and other product databases. Currently under the Version 1.0 specification, EPA does not require manufacturers to test equipment with all accessories turned "ON". As such, the current ENERGY STAR Qualifying Products list contains data for units tested with accessories both on and off and will therefore, be inconsistent with other databases. Beginning in January 2010 when the new Version 2.0 specification becomes effective, stakeholders can expect the ENERGY STAR list to be consistent with other databases, such as NRCan. In fact, EPA plans to ensure the quality of the Version 2.0 list by periodically checking data against that listed in the NRCan database.

Mislabeled Products

Stakeholders continue to submit complaints about the mislabeling of products by competitors. ENERGY STAR partners should provide any information on mislabeled products directly to EPA. After reviewing the submitted information, EPA will contact the manufacturer of the products in question to resolve any issues and will ask that the manufacturer cease using the ENERGY STAR label on products that do not meet the specification or are not covered by the program. The stakeholder that brought forth the complaint will not be named in any correspondences with the manufacturer in question.

Comment Submittal

Stakeholders are encouraged to provide written comments for EPA consideration to Bijit Kundu, ICF International, at bkundu@icfi.com by **March 20, 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. If you have any questions or concerns about the specification or partnership process, please feel free to contact me at (202)-343-9046 or kent.christopher@epa.gov.

Sincerely,



Christopher Kent
ENERGY STAR Product Development