

SMITHGROUP

August 12, 2024

US Environmental Protection Agency
William Jefferson Clinton Federal Building
Washington, D.C, U.S.

Re Energy Star for Commercial Equipment

To whom it may concern:

My name is Greg Mella, an architect with SmithGroup, but also SmithGroup's Corporate Director of Sustainability. In that role, I work with project teams across the country to push for energy conservation. SmithGroup's work is almost exclusively commercial, creating high-performance laboratories, hospitals, and University buildings. As we design more energy efficient buildings, reducing heating, cooling, and lighting loads using high-performance design, the portion of a design's overall energy use associated with plug loads/equipment has steadily grown often representing most of a building's energy consumption. Some architects and specifiers believe it is outside their scope to limit equipment energy demands, thinking that has more to do with how our clients operate the building. I have long advocated that designers can influence plug loads, and specifying energy efficient equipment is critical to that aim. The Energy Star program has been a key part of that objective. We leverage the program for laboratory grade refrigerators and freezers in our labs. We leverage the program in the design of commercial food service equipment often found in our hospital designs. We leverage the program in classrooms, selecting energy efficient AV equipment. Many sustainable rating systems, like LEED and the Living Building Challenge require or incentive using Energy Star labeled equipment in commercial applications.

Energy Conservation is seldom met through one large strategy, rather, it is the combined benefit of multiple smaller strategies that add up to significant energy use reductions. Specifying energy efficient equipment is a cost-effective strategy, and when combined with other strategies, can yield substantial energy savings. Just as the Energy Star label makes finding efficient equipment easier for residential customers; commercial architects and specifiers often also look for the Energy Star label, relying on the benchmarking by the Energy Star program to take the guess work out of this endeavor. On behalf of SmithGroup, we urge the EPA to continue the Energy Star program for commercial products.

Salutation,



Greg Mella, FAIA, LEED AP BD&C, LFA
Vice President | Corporate Director of Sustainability