



Kirsten Hesla
Climate Protection Partnerships Division
U.S. Environmental Protection Agency
Washington DC 20460

May 5, 2017

Subject: ENERGY STAR® Final Draft Automatic Commercial Ice Machine Specification v3.0

Dear Ms. Hesla:

This letter comprises the comments of the Pacific Gas and Electric Company, San Diego Gas and Electric Company, Southern California Edison, and Southern California Gas Company in response to the United States Environmental Protection Agency (U.S. EPA) request for comments on the Final Draft ENERGY STAR Automatic Commercial Ice Machine (ACIM) Specification v3.0. The signatories of this letter, collectively referred to herein as the California Investor Owned Utilities (CA IOUs), appreciate the opportunity to provide feedback on this draft.

The CA IOUs represent some of the largest utility companies in the western United States, serving over 35 million customers. As energy companies, we understand the potential of energy conservation and energy efficiency programs to cut costs and reduce consumption while maintaining or increasing consumer utility of products. We have a responsibility to our customers to advocate for voluntary program requirements that accurately reflect the climate and conditions of our respective service areas and maximize their positive effects.

The CA IOUs believe that the proposed connected functionality section of the ENERGY STAR ACIM Final Draft Specification v3.0 (“Final Draft”) can help facilitate demand response (DR) efforts by utility companies. We support the inclusion of this voluntary section and recommend that U.S. EPA carefully consider the following comments.

1) We recommend that U.S. EPA require open standards for communications to the device level for ACIMs labeled as having connected functionality.

The Final Draft currently states that open standards for communications to the device level are encouraged, but not required, to receive ENERGY STAR recognition for connected functionality (section 4.B). Instead, and contrary to the goal of encouraging open standards, the Final Draft appears to allow recognition for devices that can only function with a proprietary communications service.

The CA IOUs agree with the Consortium for Energy Efficiency’s April 11, 2017 comment that section 4.B should be revised to require open standards at the local level (i.e., to the ACIM) for

any ACIM that U.S. EPA recognizes as having connected functionality.¹ Furthermore, this change would not restrict manufacturers from also offering services to their customers using a proprietary communications system. Instead, it would ensure that the connected capabilities are available to the consumer even if the ACIM manufacturer does not offer proprietary types of services or later exits the market. It would also increase consumer choice and the potential for participating in utility DR programs.

2) We encourage U.S. EPA to enhance voluntary reporting opportunities for connected functionality.

The CA IOUs agree with U.S. EPA's proposal to provide a platform for manufacturers to list information about a product's connected functionality. We recommend increasing the proposed 250-word manufacturer summary that will appear on the ENERGY STAR website to 500 words and allowing manufactures to list any capabilities that would support locational demand response (Final Draft section 4.C). These changes would be consistent with the recent Electric Vehicle Service Equipment (EVSE) Specification v1.0 Sections 3.6.4 and 3.6.4.2(v).

We also recommend that manufacturers explain in their connected functionality summary which capabilities can be accomplished by the customer communicating to their ACIM on-site and which capabilities would require an additional service. For instance, the manufacturer should state how a consumer can accomplish the following:

- Select which DR service(s) they wish to authorize;
- Activate any DR response configuration(s); and
- Override an event.

In conclusion, we wish to reiterate our support to U.S. EPA for the ENERGY STAR program for ACIMs, and we encourage U.S. EPA to carefully consider our comments.

Sincerely,



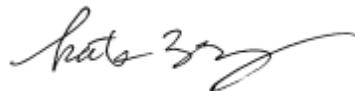
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¹ The Consortium for Energy Efficiency notes that a CTA-2045 port is an option that would facilitate a plug-in module supporting open standards-based communications to the device level.