



April 7, 2017

Ms. Kirsten Hesla
U.S. Environmental Protection Agency
(icemachines@energystar.gov)

Re: AHRI Comments on Draft 2 Version 3.0 Product Specification for ENERGY STAR Qualified Automatic Commercial Ice Makers (ACIM)

Dear Ms. Hesla:

These comments are submitted by the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) in response to the Environmental Protection Agency (EPA) request for comments on Draft 2 Version 3.0 Product Specification for ENERGY STAR Qualified Automatic Commercial Ice Makers (ACIM), issued on March 9, 2017.

AHRI is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. More than 300 members strong, AHRI is an advocate for the industry and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the annual output of the HVACR industry is worth more than \$20 billion. In the United States alone, our members employ approximately 130,000 people and support some 800,000 dealers, contractors, and technicians.

We have the following comments on Draft 2 Version 3.0 Product Specification for ENERGY STAR Qualified ACIM:

Revised Certification Criteria

We request that EPA consider adjusting the proposed ENERGY STAR energy minimums to levels that include at least one model per ice harvest rate break point or 15% acceptance for each product type, whichever is higher. This approach would provide the marketplace with more access to ENERGY STAR products.

Effective Date

We request that EPA consider updating the effective date from January 1, 2018 to January 28, 2018. January 28, 2018 is the compliance date for the Department of Energy (DOE) published final rule regarding energy conservation standards for automatic commercial ice makers.

Ice Hardness Factor

Currently, the ENERGY STAR's Qualified Product List (QPL) for ACIM lists a Continuous type ice maker with Ice Hardness Factor rating over 100%. We request EPA review the impact of Continuous type ice makers with Ice Hardness Factor greater than 100% to the Energy Consumption and Adjusted Energy Use ratings.

AHRI appreciate the opportunity to provide these comments. If you have any questions regarding this submission or would like to discuss any of these points further, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Kezhen Shen". The signature is written in a cursive, flowing style.

Kezhen Shen
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