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February 28, 2019

To: ENERGY STAR[®] Specification Development Group

Subject: Comments on Draft 2 of Proposed Energy Star Version 4.0
Product Specification for Refrigerated Beverage Vending Machines

Dear Sir or Madam:

Automated Merchandising Systems (“AMS”) is a supporter of the concepts embraced in this program and we agree that its presence has provided benefits to vending operators and particularly their customers.

As a general comment we feel strongly that more harmonization between the EPA’s Energy Star and SNAP Programs, and the DOE is necessary and would offer any assistance to that end. We recognize and applaud your recent efforts in this regard and urge you to continue to give this aspect of the rule-making process your serious consideration.

Specific Comments to Subject Proposal:

3) Certification Criteria:

a) MDEC

The equations proposed are demanding a very aggressive MDEC that is 7% below DOE’s 2019 mandated values for Class A machines and 12% below DOE’s 2019 mandated values for Class B machines. The issue we have with these MDEC allowances is the yet unknown situation caused by EPA’s SNAP Rules 20 and 21.

While the Federal implementation of these particular Rules is pending revision, California put them into effect on January 1 of this year. With the only practical means of meeting those Rules being the use of R-290 (propane), and with the placement of vending machines that use this fluid being so restricted by UL requirements, we cannot sell refrigerated machines into California at this time.

We are working on solutions that will make universal placement of these machines safe under all conditions, but to date any potential solution we have tried requires the use of additional energy.

4) Test Requirements

A) Sampling Plan

We have no comment on the use of either plan except to say that testing two units at a third party test lab will be an extra expense that AMS would probably not make use of.

B) Test Procedure

AMS agrees that it is preferable to use the DOE test procedures. We would request that it be made clear how the Energy Star program will or will not be affected by future changes to those DOE procedures.

C) Represented Value

We have no issue with this.

D) Significant Digits and Rounding

We have no issue with this. We would request that it be made clear how the Energy Star program will or will not be affected by future changes to those DOE procedures.

E) Refrigerant Reporting

We have no issue with this.

5) Effective Date

We would argue that in order to maintain the integrity of the Energy Star brand any changes to the allowable MDEC should be postponed until at least 2022 to give us time to work out all of these issues and it is fully understood the amount of energy required to safely put R-290 based machines in the marketplace.

A less acceptable alternative to this would be a graduated MDEC approach becoming more aggressive in distinct steps perhaps 2 years apart. The first period of time should run at least until 2021 and should be pegged at or within perhaps 2% of the present DOE levels. The magnitude of the subsequent energy reductions should be carefully worked out to match up with the results of

manufacturer's progress toward the elimination of the present machine placement restrictions.

6) Future Specification Revisions

We understand that certification is not automatically granted for the life of a product model, but the language here leads me to ask for clarification. If we make changes to a Model in order to meet the newest requirements, but do not want to confuse our customers with different Model Numbers, is it allowable to get the changes certified under the existing Model Number? If so, Model xx built up to 1 day before the Effective Date could be Labelled and the same Model Number built on or after the Effective Date could also be Labelled provided that it includes the design changes and indeed met the new requirements? This idea would seem to be supported in the Proposal's Item 5 on Effective Dates, but we do request clarification.

Thank you for your consideration,

Jim Collins
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