

April 25, 2016

Ms. Kirsten Hesla
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Hesla:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to *Draft 1 Version 4.0 ENERGY STAR® Commercial Refrigerator and Freezer Specification*, released by the Environmental Protection Agency (EPA) on March 24, 2016.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states, the District of Columbia, and seven Canadian provinces. In 2014, CEE members directed over \$6.7 billion of the \$8.7 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

CEE Supports EPA Consideration of Energy Savings Opportunities in the Commercial Refrigeration Market and the Proposed Approach

CEE supports the EPA decision to revise the existing ENERGY STAR specification associated with commercial refrigerators and freezers in light of the upcoming increase in the US Department of Energy minimum standards. A revision to the ENERGY STAR specification at this time allows for continued identification of the highest performing models in the commercial refrigeration market.

The revision has the potential to provide continued support to CEE members with programs for this product category, of which in 2015, 57 CEE member organizations offered 57 commercial refrigerator programs and 59 commercial freezer programs. CEE also continues to support ENERGY STAR's approach for defining ENERGY STAR eligible products by establishing product and volume specific maximum daily energy consumption (MDEC) levels. In particular, establishing the MDEC levels based on the percent of units that qualify, in contrast to a set percentage of energy savings, ensures that the program is cognizant of the need to identify an adequate number of ENERGY STAR product options in all size categories, but also the top energy savings products.

CEE Encourages Clarification on the Impact New Refrigerants Will Have on Qualifying Products and Implications for the Brand

In July 20, 2015, EPA announced the final rule to the Significant New Alternatives Policy (SNAP) program that will prohibit the use of certain refrigerants for stand-alone retail food refrigeration equipment. This rule will impact approximately 90 percent of the refrigeration products in the ENERGY STAR certified products database as of April 14, 2016 and is resulting in the introduction of a variety of new natural refrigerants. EPA notes these new refrigerants, while having a lower global warming potential, have the potential for additional energy savings and can be used to meet the proposed performance criteria for the ENERGY STAR specification and the revised federal minimum standards.

Given the 10 to 30 percent energy savings potential of new refrigerants that EPA notes in the proposal documentation, additional details on the assessment of these savings opportunities would help to ensure that the revised ENERGY STAR specification would continue to identify top performing products and avoid diluting the brand, impacting program cycles and baselines, and precipitating the need for another revision in a short period. Specifically, we recommend providing additional details in the following areas:

- How the potential energy savings from new refrigerants were considered in the determination of levels and the percentage of models meeting the proposed levels
- The number of models currently using new refrigerants in the data set and how they perform in the plots

CEE believes that additional analysis into the savings potential of new refrigerants will help to ensure the longevity and effectiveness of the ENERGY STAR Commercial Refrigerator and Freezer specification.

CEE Requests Additional Information on the Energy Savings Potential of Energy Management Systems

ENERGY STAR is proposing to allow for models with built-in or dedicated energy management systems (EMS) to be tested with the system enabled. CEE appreciates the potential for increased energy savings from these systems and supports the opportunity to capture additional savings from these systems. Members are interested in the prospect of realizing additional savings, but need to be able to measure and verify the savings from these energy management systems. Therefore, CEE encourages EPA to provide further analysis, such as:

- What percentage of the models in the data set have energy management systems
- What is the energy savings of the energy management system
- Will all models with the energy management systems continue to meet the ENERGY STAR requirements if the systems are disabled
- How easy are these systems for consumers to disable

This additional information would help to provide clarity on the energy savings opportunities from these systems and provide a better understanding of the potential persistence of savings stemming from an EMS.

CEE would once again like to thank the EPA for the opportunity to comment on *Draft 1 Version 4.0 ENERGY STAR® Commercial Refrigerator and Freezer Specification*. Please contact CEE Principal Program Manager Kate Grant at 617-337-9286 with any questions about these comments.

Sincerely,



Ed Wisniewski
Executive Director