

August 5, 2015

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 the *ENERGY STAR® Draft 2 Version 2.2 ENERGY STAR Commercial Oven Specification* (Draft Specification), released by the US Environmental Protection Agency (EPA) on June 26, 2015.

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 2013, CEE members directed nearly \$6.4 billion of the \$8 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. As noted in our first letter, CEE recognizes the divergence between the ENERGY STAR draft specification and the CEE rack oven specification; we look forward to further collaboration on future specification development.

CEE Supports the Total Idle Energy Rate Metric, and Encourages EPA to Require Reporting of Both Electric and Gas Idle Energy Rates

CEE supports ENERGY STAR's decision to expand the performance criteria metric from gas only idle energy rate to total idle energy rate since electric idle energy in rack ovens has an impact on energy consumption overall. Total idle energy rate better accounts for the energy consumption

of rack ovens, as the electric idle energy has an impact on the total energy consumption. Electric idle energy use for lower performing models can approach almost a third of the average gas idle energy use for double rack ovens, representing a significant savings opportunity. However, energy efficiency program administrators are typically required by regulators to report savings by fuel type. Therefore, programs need to understand the idle energy consumption by fuel type in order to offer incentives that reflect energy savings stemming from idle energy use specific to their regulatory mandate. While the total idle energy rate metric seems appropriate to determine the top energy performers in the rack oven market, CEE supports ENERGY STAR's reporting requirement that manufacturers provide the electric idle energy rate for rack ovens and would encourage that the gas only idle energy rate also be maintained as a reporting requirement. Including the idle energy rate for each fuel, along with the total idle energy rate, on the ENERGY STAR Qualified Products List supports energy efficiency programs efforts to accurately claim savings for rack oven idle energy use.

CEE Recommends that EPA Clarify and Develop a Definition of the Set-back Idle Mode Reporting Requirement for Consistent Reporting

CEE understands that some rack ovens have additional features, such as set-back idle modes, that provide the opportunity for increased energy savings. As ENERGY STAR acknowledges, end users are able to control these low energy features and therefore these features “may not be used in the field meaning that savings may not be realized by customers.” CEE notes that the ASTM F2093-11, *Standard Test Method for Performance of Rack Ovens*, does not currently include common practices, guidelines, or standards for determining set-back modes or other energy savings features.

Given the lack of guidance in the test method and end user control, CEE supports EPA's decision not to rely on the requirement for the specification and instead encourage customer awareness of this feature through a reporting requirement. CEE recommends that EPA consider establishing a definition of set-back idle energy mode to ensure that models reported with this feature are providing similar functionality to consumers and models can be accurately compared. Also, CEE suggests that EPA consider clarifying the set-back idle mode information that will be required for the qualifying products list. Currently, it is unclear if the reporting requirement for set-back idle mode will identify the existence of the feature in a particular model or if specific details about the feature will be required. If the reporting requirement is to provide details beyond simply noting the existence of the feature, additional considerations are needed to ensure that data regarding set-back idle energy modes is developed using common guidelines to better ensure that product data reported to EPA are comparable.

CEE Continues to Encourage EPA to Further Assess if Two Qualifying Single Rack Ovens are Adequate for ENERGY STAR to Succeed

CEE observes that under the revised performance criteria only two models continue to meet the proposed efficiency criteria for this product type. We recognize that the category consists of only nine models and that ENERGY STAR has confirmed that the models in the data set provided represent the “vast majority of models available on the market,” but CEE members still have concerns that some markets may not have access to one or both of these two compliant models. We would continue to encourage ENERGY STAR to provide assurance that the two known models are readily available throughout distribution channels or to consider an alternative approach for single rack ovens.

Thank you for your consideration of these comments. Please contact CEE Principal Program Manager Kate Grant at (617) 337-9286 with any questions.

Sincerely,



Ed Wisniewski
Executive Director