

June 19, 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 1 Version 2.2 ENERGY STAR Commercial Oven Specification* (Draft Specification), released by the US Environmental Protection Agency (EPA) on May 8, 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.

ENERGY STAR Offers Potential to Recognize Highly Efficient Single and Double Rack Ovens

CEE believes that the commercial rack ovens market is ripe for the presence of efficiency specifications to identify top performing units. CEE members have worked together and with industry over the course of several years to develop a market transformation strategy for commercial rack ovens, and in December of 2014, the CEE Board approved performance specifications for these products. This work has helped establish a foothold in the industry for identifying energy efficient rack ovens. An important objective of CEE is to work to complement the ENERGY STAR Program and enable a progression of ENERGY STAR's performance specifications over time without compromising the well established tenets of the Brand.

CEE believes that ENERGY STAR product recognition can further the market transformation for this product category if coordinated with existing and planned energy efficiency program activity. The EPA proposal rightly recognizes the lack of sufficient data to expand product coverage to additional categories, specifically quadruple and mini rack ovens. CEE shares both the desire to explore the savings potential in these product categories, and the concern that sufficient energy performance data has not been identified to this point to warrant expansion to these products. CEE members will continue to work with industry to develop and identify a sufficient data set to consider energy performance specifications.

Proposed Specifications for Double Rack Ovens Appear Consistent with Tenets of ENERGY STAR, But Additional Market Intelligence is Necessary

Based on the data provided by ENERGY STAR, the proposed double rack oven performance levels would qualify 23% of products for ENERGY STAR recognition and result in a similar percentage of annual savings as CEE Tier 1, illustrating consistency with some of the key tenets associated with ENERGY STAR. CEE notes however that while EPA has identified the number of products meeting the proposed criteria, there is no indication of what percentage of manufacturers or sales these products represent. While the percentage of models available may be one consideration, it is unclear if it is a meaningful proxy for this market or could inadvertently favor one technology or manufacturer. Clarity on the availability at typical distribution centers, percentage of manufacturers with compliant product, and the like would bolster the proposal. We encourage EPA to work with manufacturers, wholesalers, and retailers to ascertain if further data on both the current market, and potential associated with new products entering the market, is available to further support the final approach that ENERGY STAR adopts.

Regarding ENERGY STAR's principle to deliver cost-effectiveness energy savings to customers, we are encouraged by the results of EPA's savings and cost-effectiveness analysis for both double and single rack ovens which conclude "that products expected to meet the proposed levels are in some cases less expensive than more energy intensive models of similar size and capacity" (Draft Specification, page 5). However, the draft specification and supporting materials do not provide the actual data to support this statement and do not afford CEE members to understand how these opportunities will translate to available products providing reasonable consumer paybacks. It would be helpful to make available the information that supports EPA's cost-effectiveness conclusions.

EPA's proposal differs from the specification levels established by CEE in December of 2014. CEE's Tier 0 was intended to provide a consistent definition for equipment in the market that would save a significant amount of energy relative to standard equipment. CEE's Tier 1 represents another significant increment of savings however only had three models qualified at the time of adoption. It was further anticipated that based on manufacturer feedback describing an evolving

and dynamic market, that a number of additional manufacturers would be able to reach CEE Tier 1. Two manufacturers indicated support for CEE's Tier 1 requirements, which were actually made more stringent in response to industry input. However, with the ENERGY STAR proposal following so shortly on the CEE specification, the anticipated expansion of qualifying products has not yet occurred, and we believe the critical question to address given the timing of EPA's proposal is what percentage of sales do models meeting ENERGY STAR's draft specification currently represent in the market. While we believe complementary performance of ENERGY STAR and CEE's Specification is desirable for all involved, we acknowledge that the timing of the ENERGY STAR announcement relative to the CEE initiative and market changes may present a challenge to adhere to the Brand tenets. Accordingly, for this and other product categories, we welcome greater coordination and/or advanced notice for planned announcements.

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

Regarding single rack ovens, CEE observes that only two models are known that can meet the proposed efficiency criteria for this product type. We recognize that the category consists of only ten models and have concerns that some markets may not have access to the two compliant models. Assurance that the two known models are readily available throughout distribution channels would be welcomed. In terms of savings and performance levels, EPA's proposed criteria lie between CEE Tier 0 and Tier 1 (serving as a stretch tier). While CEE felt that such a limited number of manufacturers meeting a specification level is appropriate for its stretch tier, a lack of available ENERGY STAR products can frustrate stakeholders and consumers alike, particularly when it is unclear what percentage of sales those products represent and if those products are commonly available for purchase. Therefore, CEE recommends that additional market knowledge be provided to demonstrate that the proposed criteria represent approximately 25 percent of category sales, consistent with the tenets of the Program.

Other General Comments

As a final point, CEE would like to clarify that the data set of baking energy efficiency and idle energy rate attributed to CEE in the EPA cover memo should be attributed to the Food Service Technology Center. While CEE used this data set in developing its performance levels, we did not develop or verify the information; the credit for this information properly lies with the Food Service Technology Center.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ed Wisniewski
Executive Director