

December 14, 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 1.0 ENERGY STAR Commercial Coffee Brewers Specification* (Draft Specification), released by the US Environmental Protection Agency (EPA) on October 30, 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 Coffee Brewers, But Additional Data and Market Intelligence is Necessary**

CEE supports the EPA decision to address energy savings opportunities in the commercial coffee brewer market to identify top performing type II units, so long as EPA can do so in a manner consistent with the brand promise. CEE members require sufficient data, analysis, and market intelligence to make an informed assessment of the proposed specification and determine whether it could be incorporated into existing program designs. Required information includes:

market penetration and sales data by efficiency level, typical unit consumption and watt draw of installed brewers as well as the information source, cost-effectiveness and incremental cost to the customer of the base unit relative to the ENERGY STAR unit, and market sales and penetration and savings data as further described below on the differences between coffee brewers with and without warming plates.

Based on the proposal provided by ENERGY STAR, approximately 23 percent of models in the data set would meet or exceed the draft specification performance level. This assessment addresses the percentage of models currently available, without addressing the percentage of the entire market, number of manufacturers, or sales, these 23 percent of products represent.

While the percentage of models available nationally may be one consideration for establishing ENERGY STAR performance requirements, 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, and percentage of manufacturers with compliant product would bolster the proposal. CEE members also need to understand the market sales and penetration of coffee brewers, as well as the average life of a coffee brewer, to better realize the potential impact and breadth of the market this proposed specification would address. This information allows CEE member programs to identify market transformation opportunities and evaluate program performance and potential regional and local impact by referencing national figures. We encourage EPA to work with manufacturers, wholesalers, and retailers to ascertain if further data on both the current market characterization, and energy savings potential associated with new products entering the market in the near future, is available to inform a final approach. As indicated in the proposal, there can be significant differences in the energy use of coffee brewers with and without warming plates, as well as variations in energy savings modes from different design strategies, such as insulation. Given these differences among models, CEE encourages EPA to work with manufacturers and other industry representatives to understand the potential new approaches or technologies available to increase the efficiency of coffee brewers that may impact the longevity and energy savings of the proposed specification.

Program administrators would like to better understand the energy savings potential of the proposed specification, particularly the kWh savings of models meeting the ENERGY STAR specification versus baseline units. The kWh energy savings is needed for CEE members to be able to assess the energy savings opportunity in determining the potential to promote the ENERGY STAR specification for a new product category. Furthermore, CEE members are charged with supporting cost-effective energy savings for program participants. In order to evaluate any new energy performance levels, CEE members must understand both the energy savings and the incremental costs of higher performing models.

EPA indicates in the proposal that there are differences in the energy consumption of coffee brewers with and without warming plates and that both types of products are represented in the data set. However, it is not clear if both subcategories have products that would meet the

proposed specification and what the energy consumption differences are between the model types. CEE members are concerned that if the program's design does not provide for sufficient coffee brewer models with warming plates, then customers will not have efficient options available that meet the needs of customer establishments. While additional analysis about the energy consumption, test method variations, and market share and sales of these subcategories would be beneficial in assessing the proposal, CEE would encourage EPA to provide information about the alternative strategies for holding brewed coffee at ready-to-serve temperatures and ensure that efficient options are available for products with warming plates.

Thank you for your consideration of these comments. Please contact CEE Senior Program Manager George Chapman at (617) 337-9262 with any questions.

Sincerely,

A handwritten signature in blue ink that reads "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