

August 22, 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 *Final Draft Version 4.0 ENERGY STAR® Commercial Refrigerator and Freezer Specification*, released by the Environmental Protection Agency (EPA) on August 2, 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 Encourages EPA to Continue to Monitor the Impact of New Refrigerants on the Revised Specification as Additional Models Become Available

CEE appreciates EPA providing additional information regarding the proportion of current ENERGY STAR models using new refrigerants that will meet the revised specification performance criteria. Given the varying energy savings potential of new refrigerants noted in the final draft of “5-30% depending on volume, application, and other factors,” CEE would encourage

EPA to continue to monitor the impact of new refrigerants as additional models enter the market. Continued monitoring of the changes in the market will help to ensure that the revised specification for commercial refrigerators and freezers continues to identify top performers.

Product Availability Unclear for Revised Performance Criteria on Vertical Transparent Freezer Subcategory

CEE is unclear about the impact the revised performance criteria will have on product availability of the vertical transparent freezer subcategory. Given the limited number of models that currently meet the proposed specification requirements, CEE is unsure if the specification as it stands will meet both market and energy efficiency program administrator needs. A lack of available ENERGY STAR products can be challenging to program administrators when justifying programs and demonstrating cost-effectiveness, especially when it is unclear what percentage of sales those products represent and if those products are commonly available for purchase.

CEE notes that program administrators previously supported the approach defining eligible product and volume specific maximum daily energy consumption (MDEC) levels. This approach—as opposed to a set percentage of energy savings—ensures that an adequate number of ENERGY STAR product options are available in all size categories in addition to the top energy savings products.

CEE would once again like to thank the EPA for the opportunity to comment on the *Final Draft Version 4.0 ENERGY STAR® Commercial Refrigerator and Freezer Specification*. Please contact CEE Program Manager Laura Thomas at 617-337-9272 with any questions about these comments.

Sincerely,



Ed Wisniewski
Executive Director