

July 5, 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 2 Version 4.0 ENERGY STAR® Commercial Refrigerator and Freezer Specification*, released by the Environmental Protection Agency (EPA) on June 7, 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 46 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 Continues to Encourage Clarification of the Impact New Refrigerants Will Have on Qualifying Products and Implications on the Brand

CEE appreciates EPA providing additional details regarding the percent of current ENERGY STAR certified models that use new refrigerants on the existing qualifying products list. CEE continues to encourage EPA to further clarify the impact new refrigerants may have on the number of qualifying products by identifying the models using new refrigerants in the dataset

and associated plots. Given the anticipated number of commercial refrigeration units expected to enter the market using new refrigerants, it is not clear to CEE how different refrigerants could potentially impact energy efficiency opportunities and the expected impact they will have on the number of ENERGY STAR qualifying products. Additional clarity around EPA's approach for considering the impact of new refrigerants could help to ensure that the revised ENERGY STAR specification continues to identify top performing products and avoids diluting the brand and precipitating the need for another revision in a short period.

Industry Input Regarding the Revised Approach for Vertical Transparent Freezers (VCT.SC.L)

CEE observes that under the revised performance criteria for vertical transparent freezers (VCT.SC.L) only two models meet the proposed efficiency criteria based on the existing dataset and those two models are both less than 10 cubic feet in size. We recognize that the category consists of eleven models (based on our assessment of ENERGY STAR's plot) and that a few stakeholders have indicated to ENERGY STAR that this is an achievable level for this product subcategory. Those responsible for designing and developing vertical transparent freezers are best equipped to confirm whether these performance criteria are ultimately achievable, both for more models and by multiple manufacturers, than currently meet it today. Without a better understanding of the potential number of models and manufacturers that could meet the proposed levels under various size categories and the sales and market availability, CEE is unable to comment on how the revised performance criteria could meet market and program needs for this product subcategory.

CEE notes that program administrators supported the previous approach for defining eligible products by establishing product and volume specific maximum daily energy consumption (MDEC) levels. This approach—as opposed to a set percentage of energy savings—ensured 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. 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 would once again like to thank the EPA for the opportunity to comment on *ENERGY STAR® Commercial Refrigerator and Freezer Specification*. Please contact Kate Grant at 617-337-9286 or Laura Thomas at 617-337-9272 with any questions about these comments.

Sincerely,



Ed Wisniewski

Executive Director