

April 11, 2017

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 3.0 ENERGY STAR® Automatic Commercial Ice Maker (ACIM) specification*, released by the Environmental Protection Agency (EPA) on March 9, 2017.

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 2015, CEE members directed nearly \$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 Appreciates the EPA Response to Request for Additional Data and Supports Proposed Performance Levels**

CEE appreciates the clear and concise EPA response to comments on Draft 1 requesting additional data including: market penetration and sales, percent of models that meet the proposed performance criteria, percent of energy savings over federal minimum standards scheduled to take effect in 2018, average useful life, annual water savings, cost-effectiveness analysis, and incremental cost. The additional data EPA provided in response to the initial CEE comments help program administrators to more fully consider ENERGY STAR's revised

specification and inform the consensus comments submitted by CEE. In addition, this type of data is needed by efficiency program administrators to justify making ratepayer funds available to support the purchase of ENERGY STAR-labeled products. Based on the review of additional data provided by EPA, CEE is supportive of the performance criteria described in *Draft 2 Version 3.0 ENERGY STAR® Automatic Commercial Ice Maker (ACIM) specification*.

## **CEE Recommends Multiple Pathways to Connect and Open Standards Translation within the Physical Premise of the Building**

CEE supports the commercialization of ACIMs that will enable load management and customer benefits without compromising critical amenity. CEE applauds the encouragement of open standards in the ENERGY STAR connected criteria. To the extent manufacturers commercialize such products, CEE members believe there are a number of reasons for ACIMs to enable more than one means to connect; however, a local connection should be one option. In the event that ENERGY STAR plans to provide recognition opportunities for these products, CEE recommends recognizing connected ACIM criteria that require multiple pathways to connect, with at least one that is direct and on-premise. It is the belief of CEE Committee members that doing so will help ensure that a majority of consumers realize benefits and that the grid benefit is increased nationally by scaling the number of consumers and demand response providers that can leverage the load management functionality of these products.

Diverse in-field conditions (regulatory, terrain, customer density, metering infrastructure) often require a variety of communication technologies to enhance the likelihood that devices for demand response, energy efficiency, and other amenities are readily accessible. Specification of particularly acceptable pathways must recognize this diversity and provide consumers with sufficient options to make use of the added capabilities. A modular approach that is based on open standards is one option to address this diversity and provide consumers, utilities, manufacturers, and third parties with flexibility. For example, a modular communication interface such as a CTA-2045 port or some other means to ensure local access through open standards provides flexibility<sup>1</sup> to enable connectivity within the physical premises of the building and enhances the opportunity for a greater number of load management organizations to leverage demand response-capable ACIMs.

Another consideration relates to data sharing. Many CEE members would value equipment that communicates data via open standards in order to gain access to performance data across equipment types and to demonstrate value and justify promotion or partnership. Expected

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<sup>1</sup> A modular communication interface is intended to enable end use devices to work with any communication network through plug-in communication modules, to enable manufacturers to produce common models that could be distributed everywhere, and to minimize upfront cost. The communication module added to the port can communicate in a variety of ways (radio frequency, Wi-Fi, Bluetooth, etc.) and be changed out as technology or load management programs evolve.

benefits of communicating equipment include: enhanced confidence in load forecasting, enabled ability to support load balancing capabilities that offer value for distributed energy resources, dispatching enabled capability to mitigate transmission and distribution investment, and offsetting system peaks.

As DSM administrators deploy programs, there will be a need to collect and process more and more data from numerous manufacturers over time. Automated data sharing represented in standard formats and with standard data definitions is desirable for programs to achieve greater scale and lower evaluation costs. Open, local access would help ensure that the ACIMs do not become inaccessible if a given manufacturer or service provider exits or chooses to charge consumers a fee for maintaining a cloud connection, which could diminish program participation.

## CEE Encourages EPA to Provide Educational Resources for ENERGY STAR Partners to Better Understand the Market Opportunity Afforded by Connected Functionality

As noted in the EPA response to Draft 1 comments, connected products have the potential to dramatically change the way end users interact with products, but there may be a need for them to become familiar with the capabilities and potential performance tradeoffs. CEE shares the EPA expectation that connected ACIMs could benefit from resources aimed at educating stakeholders throughout the market delivery channel (including program administrators, distributors and contractors, equipment operators, and end users) about the opportunity afforded and how to effectively leverage these products as a grid resource without compromising core product amenity. While there are intricacies of connected products that are not limited to ACIMs, there may be unique capabilities worth exploring to help ensure a positive consumer experience. In responding to stakeholder comments on Draft 1, EPA provided assertions related to connected ACIMs that CEE feels would greatly benefit stakeholders if expanded upon. For example, EPA could provide stakeholders with additional clarity and guidance regarding:

- Which ACIM types, product sizes, and market segments are best positioned to enable benefits from connectivity, particularly with regard to load shifting
- When the timing of load shifting may be inopportune to ensure sufficient amenity is still achieved
- In what ways connected ACIMs could more carefully manage ice quality concerns relating to water filtration maintenance timing
- What regional characteristics may affect the realization of benefits from connected ACIMs

Helping stakeholders have a more thorough understanding of some of these issues through program and market guidance such as a central set of talking points or a white paper that can be referenced, so that messages are consistently delivered, could help ensure potential ACIM connected functionality is deployed effectively and with a thorough understanding of market risks and opportunities.

If EPA moves forward with the optional connected criteria in subsequent drafts, we support the provision of assistance to Partners in assessing potential messaging opportunities for the highest-impact features and applications.

## **CEE Supports the EPA Decision to Revise Performance Criteria to Align with the Ice Harvest Rate Break Points of the 2018 Federal Standard**

The ice harvest rate represents the range in pounds of ice a machine produces per hour, which, when applied in the DOE federal minimum standards performance calculations (2010 and 2018), indicates the water or energy use for a given harvest rate. The 2018 DOE federal minimum standard establishes revised ice harvest break points “to ensure that the standard curve was continuous (i.e., no gaps at the breakpoints between size categories).”<sup>2</sup> Maintaining the ice harvest break points established by the 2018 federal minimum standard will help avoid the potential for market confusion. The consistent use of industry-accepted and federal minimum break points will make the use of the ENERGY STAR specification easier for consumers that purchase energy efficient ice makers and for manufacturers that design them. CEE supports the EPA decision to revise the performance criteria to align with the ice harvest breakpoints of the 2018 federal minimum efficiency standards to better ensure market consistency and in consideration of product availability at various harvest rates.

As previously mentioned in the CEE comments on the Draft 1 specification, the availability of qualifying products has an important impact on the reputation of the ENERGY STAR brand and on energy efficiency programs promoting ENERGY STAR labeled products. CEE believes consistent ice harvest break points will encourage greater market availability of qualifying models that meet the proposed performance criteria.

CEE would once again like to thank the EPA for the opportunity to comment on *Draft 2 Version 3.0 ENERGY STAR® Automatic Commercial Ice Maker (ACIM) specification*. Please contact CEE Program Manager Laura Thomas at (617) 337-9272 with any questions about these comments.

Sincerely,



Ed Wisniewski  
Executive Director

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<sup>2</sup> US Department of Energy, *Technical Support Document: Energy Efficiency Program for Consumer Products and Commercial and Industrial Equipment: Automatic Commercial Ice Makers*, December 1, 2014, page 10C-6: [https://www1.eere.energy.gov/buildings/appliance\\_standards/standards.aspx?productid=53&action=viewlive#current\\_standards](https://www1.eere.energy.gov/buildings/appliance_standards/standards.aspx?productid=53&action=viewlive#current_standards)