

In the document entitled [“ENERGY STAR Products Program Strategic Vision and Guiding Principles”](#), the EPA has clearly laid out the intent of the ENERGY STAR program. The Automatic Commercial Ice Maker Specification 2.0 violates one of the key principles. Namely, that “Experience has shown that it is typically possible to achieve the necessary balance among principles by selecting efficiency levels reflective of the top 25% of models available on the market when the specification goes into effect.” During the stakeholder meeting of January 25, 2017, it was stated that over 60% over current machines meet ENERGY STAR levels. In addition, with the DOE regulations effective January 2018, Follett agrees that it is clearly time to review the specification and update it.

In Follett’s review of the Draft 1 Version 3.0 Specification for ACIM dated January 6, 2017, we believe that the proposal violates a number of these guiding principles as well and as such must be modified to bring it into harmony with the principles of the program prior to its implementation.

In my analysis of the currently listed ENERGY STAR machines, the proposed levels seem to include about half of the allowed 25%. The EPA also wishes to “allow consumers to find an efficient model in a product size, speed, or other sub-category without unnecessarily limiting choice”. According to the graphs attached to draft 1, there are significant gaps in production capacities, particularly in the continuous ice maker categories where the consumer would not have access to any machines in the production capacity that they desire. Another guiding principle indicates wanting to have “qualifying products are broadly available”. The graphs presented don’t allow for broadly available machines.

Follett urges the EPA to review the proposed standards and to set the limits at levels that will include product offerings across the production capacity spectrum that would be reasonable to meet consumer’s needs for varying demand.

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