



November 5, 2015

Energy Star Commercial Food Service Committee:

This letter is in response to the October 8th letter regarding Draft 1 Version 3.0 specification for commercial fryers.

Our understanding is that the Heavy Load cooking energy efficiency for electric fryers will be raised from 80% to 85%, and the idle energy rate limit will be reduced from 1000 watts to 800 watts, if this proposal is adopted.

As an organization we feel that reducing the idle energy rate from 1000 to 800 watts can be accomplished with minimal impact to the fryer design. We also feel that increasing the heavy load cooking energy efficiency to 85% for standard vats will be challenging and not with minimal impact to the fryer design as described in the announcement.

Our findings show that low oil volume fryers (30 pounds) and standard fryers will require a substantial amount of redesign, in order to comply. Our findings show this redesign effort is both expensive and time consuming. The redesign will require extensive electrical and heater changes, which in turn will require recertification for product safety, re-evaluation of our customers cooking curves and approvals by our customers. We feel that the cost and redesign efforts will severely impact the ROI expected with our customer base and this along with the effect of changing their current cooking parameters may outweigh the cost of investing and adopting energy star 3.0 vs choosing a non-energy star compliant fryer. Because of these significant change to the fryer design, we are proposing that standard fryers continue to be qualified as energy efficient if the heavy load cooking efficiency if 80% or above. If an incremental change is necessary, we feel that 82% reflects what existing product design and technology will accommodate inexpensively.

If there are questions regarding our proposal, please advise. I can be reached at dclaywell@hennypenny.com or by phone at 937-456-8671.

Sincerely

A handwritten signature in black ink, appearing to read 'Douglas E. Claywell', enclosed in a simple rectangular box.

Douglas E. Claywell
Engineering Product Services Manager