



## HOSHIZAKI AMERICA, INC.

618 Highway 74 South, Peachtree City, Georgia 30269 Phone (770) 487-2331

April 19, 2016

Ms. Kirsten Hesla  
ENERGY STAR  
US EPA  
Washington, D.C. 20460

RE: Comments on Draft 1 Version 4.0 ENERGY STAR Commercial Refrigerator/Freezer Specification

Dear Ms. Hesla,

Thank you for the first draft of Commercial Refrigerator and Freezer Version 4.0. We welcome the chance to review the standard as a group and help make sure the levels remain challenging, yet not impossible for the top tier of models to achieve.

Below is our request to change for the levels:

### Freezer Solid Door

- 0-15 ft<sup>3</sup> move from 60% below DOE 2017 to 15% below DOE 2017
- 15-30 ft<sup>3</sup> move from 60% below DOE 2017 to 15% below DOE 2017
- 30-50 ft<sup>3</sup> move from 15% below DOE 2017 to 10% below DOE 2017
- 50+ ft<sup>3</sup> move from 25% below DOE 2017 to 15% below DOE 2017

### Freezer Glass Door

- 0-15 ft<sup>3</sup> there are no models in this sector – need to lower accordingly
- 15-30 ft<sup>3</sup> move from 60% below DOE 2017 to 15% below DOE 2017
- 30-50 ft<sup>3</sup> move from 50% below DOE 2017 to 10% below DOE 2017
- 50+ ft<sup>3</sup> move from 50% below DOE 2017 to 10% below DOE 2017

Today the ENERGY STAR website shows 194 certified Commercial Freezers while the DOE website shows 3321 eligible models. Reviewing the new proposed standard, the freezers would have only 117 out of 3321 eligible models meet the standard. This is less than 4% of eligible models. By making the above changes, it would go up to 8%.

### Refrigerator Solid door

- 0-15 ft<sup>3</sup> move from 65% below DOE 2017 to 25% below DOE 2017
- 15-30 ft<sup>3</sup> move from 60% below DOE 2017 to 20% below DOE 2017
- 30-50 ft<sup>3</sup> move from 27% below DOE 2017 to 15% below DOE 2017
- 50+ ft<sup>3</sup> move from 54% below DOE 2017 to 25% below DOE 2017

## Refrigerator Glass Door

- 0-15 ft<sup>3</sup> move from 68% below DOE 2017 to 20% below DOE 2017
- 15-30 ft<sup>3</sup> move from 47% below DOE 2017 to 15% below DOE 2017
- 30-50 ft<sup>3</sup> move from 47% below DOE 2017 to 25% below DOE 2017
- 50+ ft<sup>3</sup> move from 44% below DOE 2017 to 25% below DOE 2017

Today the ENERGY STAR website shows 755 certified Commercial Refrigerator units while the DOE website shows 11,108 eligible models. Reviewing the new proposed standard, the refrigerators would have only 141 out of 11,108 eligible models meet the standard. This is less than 1.5% of eligible models. By making the above changes it would go up to 6%.

ENERGY STAR has formed a great partnership with the Commercial Appliances. Many states and utilities have adopted the standards as a basis for rebates to encourage selling units that meet the standard. Over the last 15 years since the Commercial Refrigerator and Freezer standard was adopted at the 2001 NAFEM show, it has become common practice to aim for that bar. We fear that if the levels are taken too low and are unachievable, that manufacturers will stop aiming for ENERGY STAR and instead change their target to just below the DOE threshold. We appreciate all the work ENERGY STAR has done with the program and we look forward to continuing collaboration to help maintain the elite status that it deserves.

Look forward to the webinar on April 21. Thanks again for all your help in this matter.

Sincerely yours,



Stephen Schaefer