



HOSHIZAKI AMERICA, INC.

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July 5, 2016

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

RE: Comments on Draft 2 Version 4.0 ENERGY STAR Commercial Refrigerator/Freezer Specification

Dear Ms. Hesla,

Thank you for draft 2 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 are our concerns for the levels proposed:

1. **Freezer Solid Door – 0-15 ft³.** Only 1 ENERGY STAR model listed today meets DOE 2017 and qualified for ENERGY STAR draft 1 at this volume range; this model no longer qualifies under draft 2. The draft 2 data plot shows 2 models meet the standard. We recommend reviewing the data and confirming that at least 1 presently listed ENERGY STAR model meets this new level.
2. **Freezer Glass Door.** Only 6 ENERGY STAR models listed today meet DOE 2017. Of the 6 models, only 1 qualifies for ENERGY STAR draft 2. The draft 2 data plot shows 3 models meet the standard. We recommend reviewing the data and confirming that more than 1 presently listed ENERGY STAR model meets this new level. If not, we recommend adjusting the plot to reflect more achievable levels.
3. **Refrigerator Glass Door.** Of the 484 currently qualified ENERGY STAR models, only 184 meet DOE 2017. Of these 184 models, only 19 qualify for ENERGY STAR draft 2. The draft 2 data plot shows considerably more models meet the standard. We recommend reviewing the plot to determine accuracy. We also recommend that only currently listed ENERGY STAR models be reviewed and the plot adjusted to allow at least 20% of the currently listed models (about 36) to meet the standard.

We look forward to the final draft and hope for close to 20% penetration in all areas to meet the expectations for our market. Thank you again for all of your help in this matter.

Sincerely yours,

Stephen J. Schaefer

Stephen Schaefer