

## **The Wittern Group Comments on Energy Star Draft 1 Version 4.0**

**10/4/2018**

The EPA is proposing adding a Food Vending machine category to the specification as defined on line 40.

We don't agree in differentiating the machines by other types of products they may vend. A glass front beverage machine can be configured to vend all beverages or all food or a mix of food and beverages and this does not change the MDEC of the machine.

Following the proposed specification, a glass front could be any of three different machines. It could be configured as a Refrigerated Beverage Class A Machine or a solid partition could be added making it a Combination A Machine or it could be configured as a Food Vending Machine.

Testing as an all beverage machine is worst case and the MDEC is not going to increase by any of these configuration changes or other foods that be put in place of the beverage(s).

The DOE and EPA does not classify commercial refrigerators by beverage, produce, meat or any other food type and a vending machine is by the definition in the proposed specification a commercial refrigerator.

In line 118 the specification excludes vending machines with heated compartments. If a refrigerated beverage vending machine has a heated compartment and is not violating the MDEC why should it be excluded? The heat doesn't have to increase energy consumption it, could be waste heat from the condensing section of the refrigeration system. This would be a design constraint that could limit innovation.