

Thanks for the opportunity to comment on the proposed V4.0 of the Energy Star requirements.

1. We are supportive of the Energy Star program and understand why the EPA has to address DOE 2017 targets but hope that if the lawsuit under review in the 7th Circuit rules to the Plaintiffs that EPA will suspend implementation until the next DOE regulated date.
2. We feel that EPA should leave the comment period open until after the webinar as information may still be in the process of being clarified by the stakeholders.
3. Please keep the definition of “Drawer Cabinet”. We believe that models using drawers are very different. Rather than eliminate this to align with the DOE, we feel the DOE should address the differences. We
4. There has been continued confusion between the terms “refrigerator-freezer” and “commercial hybrid”. We would reserve our comments on this till after the webinar.
5. We have some concerns that these numbers may be a bit aggressive. In addition to the DOE 2017 targets, many companies are working on the SNAP program. The statement that in some cases, transitioning to hydrocarbon refrigerants compound energy savings is hopeful at best. In some applications, we have not seen any savings. Some have resulted in losses.
6. While Energy Star is a voluntary program, due to its success, many segments have written an Energy Star requirement into their purchasing standards. We fear that we are running out of momentum and will eventually have our products reach the sunset point. Too aggressive a goal should be avoided while the industry tries to put multiple new regulations into place.

Sincerely

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