

**From:** Tony Pignone  
**Subject:** RE: Energy Star 3.0

Hello Julia,

Here are my comments for Energy Star 3.0. I answered the questions that are important to the manufacturing of water cooler keeping the customer in mind.

1. EPA wants to introduce criteria based on the "On Mode Test with Water Draw - All Unit Types" and "On Mode Test with Water Draw - On Demand Units Only" which are both included in the current test method. **Coolers tested in on mode test with no water draw**
2. Water temperature change: 185F for hot water and 47F for cold water. **Our hot temperature range of existing cooler is about 174-195F, so we must adjust to 185-195F. It means that working time will be increased of heating element in a unit time, and energy consumption will increase. Cold water temperature reduced to 47F, also need to adjust cold control. These changes will make cooler work more frequently, resulting in a substantial increase in stand-by energy consumption.**
3. Clarifying Definitions and Scope for this Specification: Set a standard to carbonator coolers or coolers with other function. **Our BSS carbonator was tested on mode test with no water draw. In ES test, carbonator system is in a stand-by state, and the energy consumption of this system is very low. In stand-by mode, the energy consumption of carbonator is very similar to standard cooler.**
4. Alternative Refrigerants and Foams. **On refrigerants, manufacturer has prepared the equipment with R290 to this challenge.**
5. Is there different foam insulation to reduce energy? **Not to our knowledge**
6. How is Energy star tested? **Test mode with no water draw. In stand-by mode, measure the energy consume for 24 hours.**
7. Does manufacturer recommend a usage operating schedule **No.**
8. Does manufacturer support the set point changes on the Hot and Cold temperatures. **They don't support this change. Adjust set point will increase energy. Will have to redesign a new heating system to meet ES standard.**
9. Any factors to consider if the Energy star test methods are changed **Changing ES test method, factory can't give any comments before they learn more about test mode with water draw.**



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