

## Appliance Standards Awareness Project

June 23, 2021

Ga-Young Park  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**RE: ENERGY STAR® Consumer Refrigeration Products Version 5.1 Draft Specification**

Dear Ms. Park,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the Consumer Refrigeration Products Version 5.1 Draft Specification released on May 12, 2021. We appreciate the opportunity to comment.

**We support adding coolers to the scope of the specification for consumer refrigeration products.** The Department of Energy (DOE) estimates that about 1.5 million coolers are sold annually.<sup>1</sup> As EPA shows in the data package accompanying the draft specification, there are cooler models across the range of volumes that consume significantly less energy than models just meeting the current DOE standards.<sup>2</sup> An ENERGY STAR specification for coolers will help consumers identify the most efficient products and has the potential to yield significant energy bill savings and reductions in CO<sub>2</sub> emissions.

**We support the proposed certification criteria for coolers.** EPA is proposing to establish certification criteria for coolers that represent energy savings of 10-30% relative to the DOE standards.<sup>3</sup> These proposed criteria can be met by about 23% of existing models.<sup>4</sup> EPA estimates that for freestanding compact coolers, which represent the vast majority of sales, the incremental cost to meet the proposed certification criteria is about \$20,<sup>5</sup> and the payback period is less than 5 years, which is less than half the average lifetime of a compact cooler.<sup>6</sup>

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<sup>1</sup> <https://www.regulations.gov/document/EERE-2011-BT-STD-0043-0118>. p. 9-3.

<sup>2</sup>

<https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%205.1%20Consumer%20Refrigeration%20Products%20Draft%20Data%20Package.xlsx>. “2. Key Product Criteria” tab.

<sup>3</sup>

[https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%205.1%20Consumer%20Refrigeration%20Products%20Draft%20Specification\\_0.pdf](https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%205.1%20Consumer%20Refrigeration%20Products%20Draft%20Specification_0.pdf). pp. 5-6.

<sup>4</sup> Ibid. p. 6.

<sup>5</sup>

<https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%205.1%20Consumer%20Refrigeration%20Products%20Draft%20Data%20Package.xlsx>. “5. Incremental Cost and Payback” tab. EPA evaluated the incremental cost for freestanding compact coolers that cost less than \$1,000. For models that cost more than \$1,000, EPA found that there were efficient models that “were at or below the cost of the models near the federal standard.”

<sup>6</sup> DOE estimates that the average lifetime for coolers is 10.3 years. See p. 8-11 at <https://www.regulations.gov/document/EERE-2011-BT-STD-0043-0118>.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Joanna Mauer". The script is cursive and fluid, with the first letter of each word being capitalized and larger than the others.

Joanna Mauer  
Technical Advocacy Manager