

Appliance Standards Awareness Project

February 16, 2022

Tanja Crk
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Commercial Refrigerators and Freezers Version 5.0 Final Draft Specification

Dear Ms. Crk,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the Commercial Refrigerators and Freezers Version 5.0 Final Draft Specification released on January 19, 2022. We appreciate the opportunity to comment.

We support EPA's revision of the ENERGY STAR specification for commercial refrigerators and freezers. The updated requirements for vertical refrigerators and freezers with solid doors (VCS.SC.M and VCS.SC.L) will ensure that the specification continues to recognize the most energy efficient equipment. Furthermore, the expansion of the specification to service over counter refrigerators (SOC.SC.M) and chef bases and griddle stands will help purchasers easily distinguish the most efficient models in these categories and will achieve additional carbon reductions.

As part of the Draft 1 specification, EPA released a data assembly template to collect performance data on refrigerated preparation and buffet tables. We encourage EPA to continue to attempt to gather data on refrigeration preparation and buffet tables in order to be able to consider incorporating these equipment categories in a future specification. We also encourage EPA to continue to consider the potential to include blast chillers and freezers in a future specification.

Thank you for considering these comments.

Sincerely,



Joanna Mauer
Technical Advocacy Manager