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June 23, 2021

Ms. Ga-Young Park
U.S. Environmental Protection Agency (EPA)
Climate Protection Partnership Division
ENERGY STAR Labeled Products
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: ENERGY STAR® Version 5.1 Consumer Refrigeration Specification

Dear Ms. Park:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the United States (U.S.) Environmental Protection Agency (EPA) ENERGY STAR® Consumer Refrigeration Version 5.1 Product Specification.

The signatories of this letter, collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western U.S., serving over 32 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

The CA IOUs appreciate this opportunity to provide comments on the Version 5.1 Consumer Refrigeration Specification. We commend EPA for expanding the product category to include Miscellaneous Refrigeration (MREF) products, as well as align definitions with U.S. Department of Energy (DOE). We are supportive of the efficiency levels proposed by EPA for MREFs, but recommend expanding the revision to include combination MREFs, a credit for connectivity, and consider a larger revision of the product category, especially for refrigerators. In support of our position, we strongly urge EPA to consider the following comments.

1. The CA IOUs are supportive of the proposed scope expansion to include MREFs and align with DOE's product definitions.

The CA IOUs are pleased to see EPA's expansion of the Consumer Refrigeration product category to include coolers and other products classified as MREFs. There are a wide variety of MREF products currently on the market, and the addition of ENERGY STAR qualification to bring visibility and to spur continued investments in high efficiency products is much appreciated. Furthermore, the efficiency levels proposed by EPA for the four identified classes of

MREFs look to strike the proper balance between leading efficiency, product availability, diversity in brands, and cost-effectiveness.

Additionally, the CA IOUs are pleased to see EPA's alignment with DOE's product definitions for MREFs, which will solidify consistency in this market and avoid any potential confusion between DOE and ENERGY STAR Standards. In addition to bringing MREFs into the ENERGY STAR product category, we recommend EPA strongly consider opportunities to further promote high-efficiency MREFs through either inclusion in the 2022 ENERGY STAR Most Efficient program or through promotion with the ENERGY STAR Emerging Technology Award program.

2. The CA IOUs believe combination cooler units should be included in Version 5.1 of the Consumer Refrigeration Specification.

While we commend EPA for adding MREFs into the Consumer Refrigeration product category, the CA IOUs respectfully request that the combination cooler products be included in the expanded scope. Through our analysis, detailed in Appendix A, we have found a sufficient number of models, variety of manufacturers, and an existing delineation at 10 percent more energy efficient than the DOE Standards. All of these factors support the inclusion of combination units in Version 5.1. While combination coolers (DOE Product Group C-13A, C-9, and C-13A-BI) represent only 52 out of 726 total models listed in the DOE MREF compliance certification management system (CCMS) as of June 16, 2021, there are more models listed that fall into the combination category than those in either the Built-in or Built-in Compact cooler categories that EPA is proposing to cover through the Version 5.1 specification.

Expanding Version 5.1 to include all classes of coolers would further align with DOE by ensuring an ENERGY STAR qualification is available for each of the DOE product categories. While ENERGY STAR is a voluntary program, it sets the path for efficiency for the full market and promotes market investment in efficiency. Should combination coolers not be eligible to qualify for ENERGY STAR, market leading efficient products would not have a means of being recognized, resulting in less incentive to innovate and implement technologies to improve their energy efficiency in the future. This could lead to stagnant energy efficiency innovation and potentially hinder future DOE Standard improvement evaluations.

3. Connectivity is important to the CA IOUs and should continue to be promoted through ENERGY STAR for both grid and greenhouse gas benefits by extending the connectivity credit to MREFs.

The CA IOUs would like to confirm our commitment to connected functionality across product categories, including MREFs and other smaller loads. Connected functionality and an appliance's capability to participate in demand response events is of strong interest for California. Through CA Senate Bill 49 (SB49), California, along with other states, is looking to demand response as an option in our flexible demand standards to meet the needs of a progressively dynamic electrical grid increasingly powered by renewables.¹ By further encouraging manufacturers to produce connected appliances, ENERGY STAR certification could contribute to greater grid reliability and decarbonization.

Given California's priorities with SB 49 and the federal research into Grid-Interactive Efficient Buildings (GEBs),² we strongly urge EPA to continue to use all available tools to encourage

¹ California Senate Bill 49: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB49.

² More information on GEBs at: <https://www.energy.gov/eere/buildings/grid-interactive-efficient-buildings>.

market expansion of connected products. Through our review of online retailers, we found several MREF products that already offer connected functionality.³ Furthermore, MREFs may be well suited for load shifting, as they have non-perishable products and potentially lower utilization than a refrigerator or freezer. For some cooler owners, connected functionality may mean a significant portion of the load could be shifted as they may sit empty for periods of time or with beverages that can tolerate controlled temperature fluctuations and still maintain quality and customer satisfaction. This potential opportunity is significant when compared to refrigerators and freezers that have more sensitive use profiles (i.e., used daily use with perishable items or must continuously maintain sub-freezing temperatures).

In the Version 5.0 Refrigerator and Freezer Specification finalized in 2013, EPA included a five percent “adder” for connected refrigerators and freezers.⁴ **The CA IOUs recommend that EPA extend the connectivity “adder” of five percent for all consumer refrigeration products to allow connected MREFs to qualify in this 5.1 revision.** In addition to the justification of this action as detailed above, we believe this should be technologically feasible, given that the DOE test procedure for MREFs is the same as that for full-size refrigerators that are already given this adder.

Furthermore, we recommend EPA continue to promote connected functionality where possible in both the consumer refrigeration specification and beyond, even for smaller loads. While EPA noted in the Version 5.1 cover memo “dwindling interest in demand response programs for residential refrigerators and most other traditional appliances,” we do not feel this accurately reflects the level of interest from both the CA IOUs and California State regulators in maximizing high-efficiency connected loads to achieve efficiency, grid reliability, and decarbonization goals.

4. The CA IOUs encourage EPA to further advance this specification.

The steps EPA has taken to bring MREF products into the Consumer Refrigeration product category are welcomed, though the CA IOUs also recommend EPA strongly consider a full Version 6.0 update especially with regards to refrigerators and freezers. Since the finalization of the Version 5.0 specification in 2013, ENERGY STAR certified refrigerators have maintained a predominant position in the market, representing nearly half⁵ all refrigerator sales, significantly and consistently above the ENERGY STAR goal of 25 percent of the market.⁶

Furthermore, the ENERGY STAR levels are no longer being referenced for refrigerator rebates, with Retail Product Platform (RPP) incentives being given to either ENERGY STAR Most Efficient (ESME) or Emerging Technology Award winning products. Even though they are not receiving rebates through RPP, the overwhelming majority of sales through the RPP program for bottom-mounted freezer and compact products are coming in the form of ENERGY STAR qualified products, as seen in **Error! Reference source not found.**⁷ The specification for these

³ Several connected MREFs were found available, including at [Best Buy](#); [Home Depot](#); [Appliance Connection](#).

⁴ Should the full Consumer Refrigeration specification be updated to a Version 6.0, there may be analytical justification to revise the 5% adder. Background on the initial reasoning for 5% is available here:

https://www.energystar.gov/sites/default/files/specs/private/Petition_to_ENERGY_STAR_from_Joint_Stakeholders.pdf.

⁵ EPA’s Annual Shipment database shows levels above 40% since V5.0 became effective. Data collected from the RPP program has shown similar if not higher levels of market share for ENERGY STAR refrigerators, see NEEA’s 2020 Letter to DOE:

<https://www.regulations.gov/comment/EERE-2017-BT-STD-0003-0018>.

⁶ See slide 24: https://www.energystar.gov/ia/partners/refs/downloads/ENERGY_STAR_101_Overview.pdf?0b55-1475

⁷ RPP data presented here represents sales from NEEA, estimated to represent 70% of all units sold in the Northwest. Further details in 2020 letter to DOE: <https://www.regulations.gov/comment/EERE-2017-BT-STD-0003-0018>.

products is in need of revision to achieve the ENERGY STAR goal of ENERGY STAR products representing 25 percent of the market.

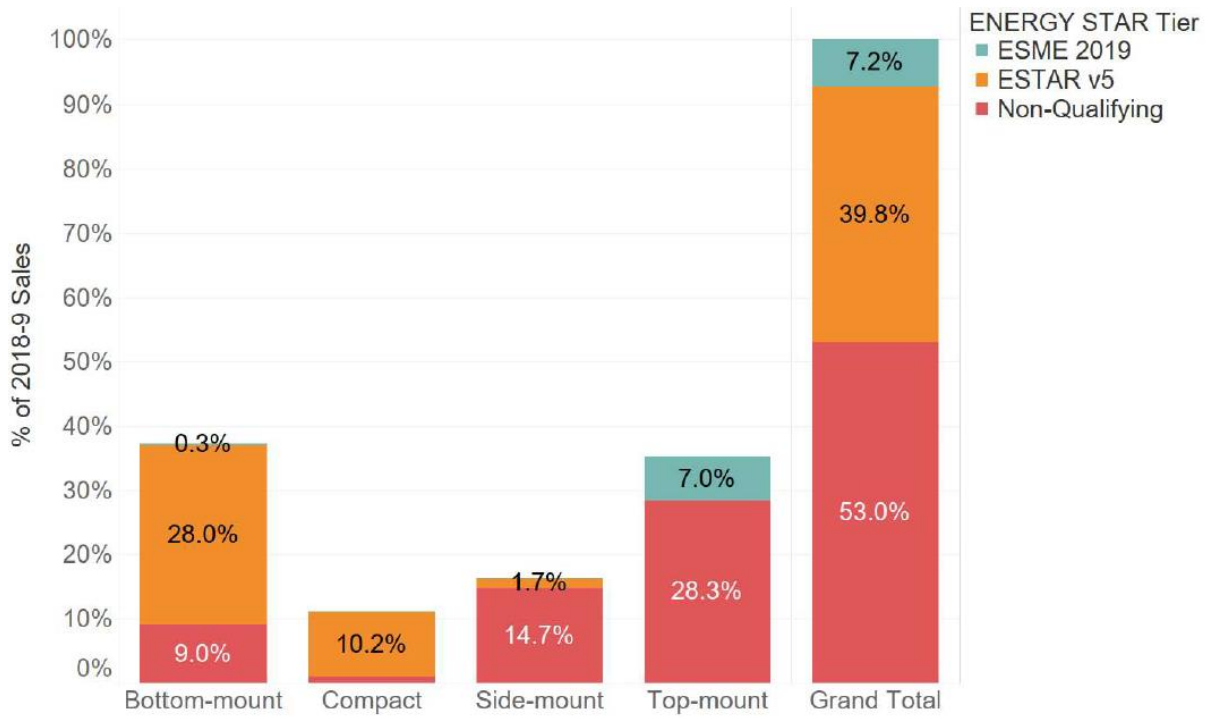


Figure 1: RPP Sales Data for 2018-2019 by DOE Product Class

Source: Northwest Energy Efficiency Alliance, public comment on DOE RFI for Consumer Refrigerators, Refrigerator-Freezers, and Freezers Standards.⁸

Additionally, over 99 percent of the top-mounted freezer products on the ENERGY STAR Qualified Products List (QPL) qualify as ESME,⁹ indicating that the performance needed to qualify for ESME certification needs to improve to promote the top performing products and future innovation. The non-ESME qualified energy efficiency performance also needs to improve to account for the shift in market performance, as represented by the overwhelming amount of ESME top-mounted freezer products.

The CA IOUs recognize that changes are currently underway for the DOE test procedure for this product category, but nevertheless, we encourage EPA to take steps now to further advance the market in parallel to working with DOE on an improved test procedure. One opportunity could be integrating the alternate compliance test from the ENERGY STAR Emerging Tech award winners into the existing Consumer Refrigeration specification. This alternative compliance test captures the performance impacts of products operating in different and more realistic ambient conditions. We analyzed the Emerging Technology Award winners that certified through the alternative “Option 2” test method, as detailed in Table 1. Each of these units did meet ENERGY STAR levels without the alternative compliance test, but while they were stand-out products

⁸ <https://www.regulations.gov/comment/EERE-2017-BT-STD-0003-0018>.

⁹ ENERGY STAR QPL downloaded on June 9, 2021 lists 497 ENERGY STAR qualified top-mounted freezer products with 493 of them being ESME products.

when using the alternative test method, their performance using the current DOE test method was only at or very slightly above the minimum to qualify for ENERGY STAR.

Table 1: 2020/2021 ENERGY STAR® Emerging Technology Award Winning Advanced Adaptive Compressor Models: Models Qualifying EPA’s “Option 2” Test Method¹⁰

| Brand | Model Number | Total Volume (ft ³) | Low Global Warming Potential Refrigerant Type | Low-GWP Foam Type | % Better than Federal Standard | % Better than Compressor in Fixed Speed (Conventional) Setting |
|---------|--------------|---------------------------------|---|-------------------|--------------------------------|--|
| LG | LFXS26596 | 26.0 | R-600a | Cyclopentane | 10%† | 25.1% |
| LG | LRMVS3006 | 29.5 | R-600a | Cyclopentane | 5%† | 30.0% |
| Samsung | RF27T5201** | 27.0 | R-600a | Cyclopentane | 11% | 25.2% |
| Samsung | RF27T5241** | 27.0 | R-600a | Cyclopentane | 11% | 25.0% |
| Samsung | RF27T5501** | 26.5 | R-600a | Cyclopentane | 5%† | 25.8% |
| Samsung | RF28T5021** | 28.2 | R-600a | Cyclopentane | 10% | 27.6% |
| Samsung | RF28T5101** | 28.2 | R-600a | Cyclopentane | 10% | 27.6% |
| Samsung | RF28T5001** | 28.2 | R-600a | Cyclopentane | 10% | 29.1% |
| Samsung | RF28T5F01** | 27.7 | R-600a | Cyclopentane | 5%† | 27.0% |
| Samsung | RS27T5561** | 26.7 | R-600a | Cyclopentane | 5%† | 25.3% |
| Samsung | RS22T5201** | 22.0 | R-600a | Cyclopentane | 5%† | 26.0% |
| Samsung | RS22T5561** | 21.5 | R-600a | Cyclopentane | 5%† | 25.6% |
| Samsung | RZ11M7074** | 11.4 | R-600a | Cyclopentane | 10%‡ | 25.2% |

†Connected product

‡ Freezer

If EPA believes the alternative “Option 2” test method is indicative of real-world savings, it would be beneficial to include additional information on system performance using this test method across the Consumer Refrigeration product category rather than just for the 13 award-winning products. We encourage EPA to incorporate this alternative test procedure into all consumer refrigeration products to provide consumers with the most relevant and representative energy consumption information, at least as a voluntary listing for manufacturers who want to demonstrate improved real-world performance. Furthermore, we encourage EPA to promote listing of refrigerants, which will give more visibility into low-GWP products and the total greenhouse gas emissions from a refrigerator.

¹⁰ Table generated from https://www.energystar.gov/about/awards/energy_star_emerging_technology_award_consumers/2020_advanced_adaptive_compressors, where the “Option 2” test awardees are defined as outperforming the federal minimum standard by at least 25% compared to when the compressor is in a fixed-speed mode, when the compressor is in adaptive mode.

In conclusion, we would like to reiterate our support to EPA's Consumer Refrigeration Version 5.1 Specification. We thank EPA for the opportunity to be involved in this process and encourage EPA to carefully consider the recommendations presented in this letter.

Sincerely,



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Appendix A: Combination cooler products for inclusion

Upon further analysis, we found that there was a diversity across brands and sizes within the combination category. Additionally, we found a natural efficiency break at 10 percent above the DOE minimum required efficiency for this product category.

In Table A1 and A2 below, we have included all CCMS products. Table 2 is color coded, with red highlights as clear model number duplicates and orange highlights as presumed model number duplicates. Even when the base number of units is presumed be the most conservative, the justification for an ENERGY STAR level at 10 percent for combination coolers is strong.

Table A1. Summary of Combination Cooler Market Across Several Scenarios

| | Least Conservative (all models listed) | Moderate Conservative (remove clear model number duplicates) | Very conservative (remove clear and potential model duplicates) | Most Conservative (remove clear and potential model duplicates, only C-13A) |
|---|--|--|---|---|
| # of products | 52 | 32 | 19 | 17 |
| # of brands | 18 | 18 | 13 | 11 |
| # of products meeting 10% or more | 14 | 9 | 7 | 6 |
| # of brands with products meeting 10% or more | 8 | 8 | 6 | 5 |
| % of models meeting 10% or more | 27% | 28% | 37% | 29% |

Table A2. Full DOE CCMS Listing for Combination Cooler products (C-13A, C-13A-BI, and C-9).

| Brand Names | Product Group Code Description | Basic Model Number | Individual Model Number Covered by Basic Model | Total Refrigerated Volume Cubic Feet | Total Adjusted Volume Cubic Feet | Annual Energy Use kWh/yr | Minimum Efficiency | % above DOE Minimum |
|-----------------|---|--------------------|--|--------------------------------------|----------------------------------|--------------------------|--------------------|---------------------|
| Wine Enthusiast | C-13A. Compact cooler with all-refrigerator —automatic defrost | JC-70 | 288 03 24 01 | 2.4 | 2.4 | 123 | 208 | 41% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5181KBC | KUB*214KPA** | 4.9 | 4.9 | 177 | 223 | 21% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5181KBC | KUB*314KSS** | 4.9 | 4.9 | 177 | 223 | 21% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5181KBC | KUB*314KBS** | 4.9 | 4.9 | 177 | 223 | 21% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5181KBC | KUB*214KSB** | 4.9 | 4.9 | 177 | 223 | 21% |
| JENN-AIR | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5181JBC | JUBF*242H*** | 4.9 | 4.9 | 177 | 223 | 21% |
| Wine Enthusiast | C-13A. Compact cooler with all-refrigerator —automatic defrost | JC-98D | 288 03 32 03 | 3.2 | 3.2 | 172 | 213 | 19% |
| LG | <i>C-9. Cooler with upright freezers with automatic defrost without an automatic icemaker</i> | URETC1408* | URETC1408* | 15.3 | 19.1 | 210 | 254 | 17% |
| Dometic | C-13A. Compact cooler with all-refrigerator —automatic defrost | MoBar 300S | MoBar 300S | 1.8 | 1.8 | 170 | 204 | 17% |
| Dometic | C-13A. Compact cooler with all-refrigerator —automatic defrost | MoBar 51SZAZ | MoBar 51SZAZ | 1.8 | 1.8 | 170 | 204 | 17% |
| Avallon | C-13A. Compact cooler with all-refrigerator —automatic defrost | AWBC241GGFD BLSS | AWBC241GGFDBLSS | 5.2 | 5.2 | 195 | 225 | 13% |

| | | | | | | | | |
|--------------------------------|---|--------------|--|-----|-----|-----|-----|-----|
| Avallon | C-13A. Compact cooler with all-refrigerator —automatic defrost | AWBC241GGFD | AWBC241GGFD | 5.2 | 5.2 | 195 | 225 | 13% |
| SUMMIT | C-13A. Compact cooler with all-refrigerator —automatic defrost | ALFD24WBV | ALFD24WBV*** | 4.1 | 4.1 | 197 | 218 | 10% |
| SUMMIT | C-13A. Compact cooler with all-refrigerator —automatic defrost | CLFD243WBV | CLFD243WBV**** | 4.1 | 4.1 | 197 | 218 | 10% |
| SUMMIT | C-13A. Compact cooler with all-refrigerator —automatic defrost | SWBV3071 | SWBV3071** | 6.4 | 6.4 | 214 | 232 | 8% |
| Hestan Commercial Corp | C-13A. Compact cooler with all-refrigerator —automatic defrost | HM24CO-3-*** | HM24CO-3-1L, HM24CO-3-1LL, HM24CO-3-1R, HM24CO-3-1RL, HM24CO-3-3L, HM24CO-3-3LL, HM24CO-3-3R, HM24CO-3-3RL | 5 | 5 | 215 | 223 | 4% |
| Perlick | C-13A. Compact cooler with all-refrigerator —automatic defrost | HP24C*-3-*** | HP24CO-3-1L, HP24CO-1LL, HP24CO-3-1R, HP24CO-3-1RL, HP24CO-3-2L, HP24CO-3-2LL, HP24CO-3-2R, HP24CO-3-2RL, HP24CO-3-3L, HP24CO-3-3LL, HP24CO-3-3R, HP24CO-3-3RL, HP24CO-3-4L, HP24CO-3-4LL, HP24CO-3-4R, HP24CO-3-4RL, HP24CS-3-1L, HP24CS-3-1LL, HP24CS-3-1R, HP24CS-3-1RL, HP24CS-3-2L, HP24CS-3-2LL, HP24CS-3-2R, HP24CS-3-2RL, HP24CS-3-3L, HP24CS-3-3LL, HP24CS-3-3R, HP24CS-3-3RL, HP24CS-3-4L, HP24CS-3-4LL, HP24CS-3-4R, HP24CS-3-4RL | 5 | 5 | 215 | 223 | 4% |
| Perlick | C-13A. Compact cooler with all-refrigerator —automatic defrost | HP24C*-3-*** | HP24CO-3-1L, HP24CO-1LL, HP24CO-3-1R, HP24CO-3-1RL, HP24CO-3-2L, HP24CO-3-2LL, HP24CO-3-2R, HP24CO-3-2RL, HP24CO-3-3L, HP24CO-3-3LL, HP24CO-3-3R, HP24CO-3-3RL, HP24CO-3-4L, HP24CO-3-4LL, HP24CO-3-4R, HP24CO-3-4RL, HP24CS-3-1L, HP24CS-3-1LL, HP24CS-3-1R, HP24CS-3-1RL, HP24CS-3-2L, HP24CS-3-2LL, HP24CS-3-2R, HP24CS-3-2RL, HP24CS-3-3L, HP24CS-3-3LL, HP24CS-3-3R, HP24CS-3-3RL, HP24CS-3-4L, HP24CS-3-4LL, HP24CS-3-4R, HP24CS-3-4RL | 5 | 5 | 215 | 223 | 4% |
| Kalamazoo Outdoor Gourmet, LLC | C-13A. Compact cooler with all-refrigerator —automatic defrost | HK24CO-3-*** | HK24CO-3-1L, HK24CO-3-1LL, HK24CO-3-1R, HK24CO-3-1RL, HK24CO-3-2L, HK24CO-3-2LL, HK24CO-3-2R, HK24CO-3-2RL, HK24CO-3-3L, HK24CO-3-3LL, HK24CO-3-3R, HK24CO-3-3RL, HK24CO-3-4L, HK24CO-3-4LL, HK24CO-3-4R, HK24CO-3-4RL | 5 | 5 | 215 | 223 | 4% |
| U-Line | C-13A. Compact cooler with all-refrigerator —automatic defrost | BD524 | UHBD524-IG01A | 5.1 | 5.1 | 220 | 224 | 2% |
| U-Line | C-13A. Compact cooler with all-refrigerator —automatic defrost | BD524 | UHBD524-IS01A | 5.1 | 5.1 | 220 | 224 | 2% |
| U-Line | C-13A. Compact cooler with all-refrigerator —automatic defrost | BD524 | UHBD524-SG01A | 5.1 | 5.1 | 220 | 224 | 2% |
| U-Line | C-13A. Compact cooler with all-refrigerator —automatic defrost | BD524 | UHBD524-SG51A | 5.1 | 5.1 | 220 | 224 | 2% |
| U-Line | C-13A. Compact cooler with all-refrigerator —automatic defrost | BD524 | UHBD524-SG41A | 5.1 | 5.1 | 220 | 224 | 2% |
| EdgeStar | C-13A. Compact cooler with all-refrigerator —automatic defrost | CWB1760FD | CWB1760FD | 4.1 | 4.1 | 215 | 218 | 1% |
| Hestan | C-13A. Compact cooler with all-refrigerator —automatic defrost | HM24C*4H | HM24C*4H-**-***** | 5 | 5 | 221 | 223 | 1% |
| Kalamazoo Outdoor Gourmet | C-13A. Compact cooler with all-refrigerator —automatic defrost | HK24C*4H | HK24C*4H-**-***** | 5 | 5 | 221 | 223 | 1% |
| Perlick | C-13A. Compact cooler with all-refrigerator —automatic defrost | HP24C*4H | HP24C*4H-**-***** | 5 | 5 | 221 | 223 | 1% |
| NEWAIR | C-13A-BI. Built-in compact cooler with all-refrigerator —automatic defrost | JC-116A2EQ | AWB-360DB | 4.1 | 4.1 | 238 | 240 | 1% |
| Silhouette Professional | C-13A. Compact cooler with all-refrigerator —automatic defrost | DBC047D2* | DBC047D2BSSPR | 4.7 | 4.7 | 220 | 222 | 1% |
| Silhouette Professional | C-13A. Compact cooler with all-refrigerator —automatic defrost | SPRBC047D1* | SPRBC047D1SS | 4.7 | 4.7 | 220 | 222 | 1% |
| Zephyr | C-13A. Compact cooler with all-refrigerator —automatic defrost | PRWB24C32BG | PRWB24C32BG | 5.2 | 5.2 | 223 | 225 | 1% |

| | | | | | | | | |
|-------------------|--|---------------|---------------|-----|-----|-----|-----|----|
| Whirlpool | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5181WBC | WUB50X24HZ0* | 5.2 | 5.2 | 223 | 225 | 1% |
| Zephyr | C-13A. Compact cooler with all-refrigerator —automatic defrost | PRWB24C32BS | PRWB24C32BS | 5.2 | 5.2 | 223 | 225 | 1% |
| Whirlpool | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5181WBC | WUB50X24HV0* | 5.2 | 5.2 | 223 | 225 | 1% |
| Appliance Support | C-13A. Compact cooler with all-refrigerator —automatic defrost | UWB24C32BG | UWB24C32BG | 5.2 | 5.2 | 223 | 225 | 1% |
| Whirlpool | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5181WBC | WUB35X24HZ0* | 5.2 | 5.2 | 223 | 225 | 1% |
| Appliance-Support | C-13A. Compact cooler with all-refrigerator —automatic defrost | UWB24C32BG | UWB24C32BG | 5.2 | 5.2 | 223 | 225 | 1% |
| TITAN | C-13A. Compact cooler with all-refrigerator —automatic defrost | SS-WB241670DZ | SS-WB241670DZ | 5.2 | 5.2 | 223 | 225 | 1% |
| TITAN | C-13A. Compact cooler with all-refrigerator —automatic defrost | TT-FRBW6420DZ | TT-FRBW6420DZ | 5.2 | 5.2 | 223 | 225 | 1% |
| TITAN | C-13A. Compact cooler with all-refrigerator —automatic defrost | SS-WB150840DZ | SS-WB150840DZ | 3.1 | 3.1 | 211 | 212 | 1% |
| EdgeStar | C-13A. Compact cooler with all-refrigerator —automatic defrost | CWB8420DZ | CWB8420DZ | 4.6 | 4.6 | 220 | 221 | 0% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5180KBC | KUBR304ESS | 4.7 | 4.7 | 221 | 222 | 0% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5180KBC | KUBL304ESS | 4.7 | 4.7 | 221 | 222 | 0% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5180KBC | KUBL304EBS | 4.7 | 4.7 | 221 | 222 | 0% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5180KBC | KUBR304EBS | 4.7 | 4.7 | 221 | 222 | 0% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5180KBC | KUBR204ESB | 4.7 | 4.7 | 221 | 222 | 0% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5180KBC | KUBL204ESB | 4.7 | 4.7 | 221 | 222 | 0% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5180KBC | KUBR204EPA | 4.7 | 4.7 | 221 | 222 | 0% |
| KitchenAid | C-13A. Compact cooler with all-refrigerator —automatic defrost | PR5180KBC | KUBL204EPA | 4.7 | 4.7 | 221 | 222 | 0% |
| Dometic | C-13A. Compact cooler with all-refrigerator —automatic defrost | MoBar 550S | MoBar 550S | 3.5 | 3.5 | 214 | 214 | 0% |
| Dometic | C-13A. Compact cooler with all-refrigerator —automatic defrost | MoBar 100DZAC | MoBar 100DZAC | 3.5 | 3.5 | 214 | 214 | 0% |

Products in red represent clear model number duplicates. Products in orange represent potential model duplicates. On the left-most column, products are sorted by efficiency level from highest above DOE minimum to lowest. Finally, only one C-9 product and one C-13A-BI product are on this list; those two products have additional bold and bold/italics respectively to visually remove them from the list.