



February 23, 2021

Tanja Crk
ENERGY STAR Product Manager
U.S. Environmental Protection Agency
Washington, DC 20460

Subject: ENERGY STAR® Commercial Refrigerators and Freezers
Version 5.0 Specification and Test Method Discussion Guide

Dear Ms. Crk:

Continental Refrigerator has been a proud ENERGY STAR Partner for many years and we value the importance this program to the commercial refrigeration industry. As an active participant in the program, we appreciate your consideration of our feedback to the Discussion Guide.

In regards to Test Method and Ratings for Refrigerated Preparation and Buffet Tables, an industry-accepted standard method is needed that is reliable, repeatable, and is not overly burdensome. While the ASTM F2143-01 Test Method is a starting point, there is a need for thorough vetting of this standard and modifications to obtain input from wide groups of stakeholders. These products must meet stringent NSF 7 performance test requirements for temperature maintenance, which should be considered in conjunction with energy test procedure, for consistency.

Ratings of Refrigerated Preparation and Buffet Tables become complicated by the wide variety of pan configurations offered for these products. Ratings would need to reflect pan capacities as well as internal storage capacities. Multiple equipment classes would be required, based on the pan configurations.

In regards to Chef Bases and Griddle Stands, as noted in the Guide, these products are designed for extreme temperature applications with heat-generating cooking equipment placed directly on them. The refrigeration systems must be sized to overcome the substantial heat load and maintain proper refrigerated temperatures. Food safety is always the primary requirement. The current DOE CRE test procedure, performed at 75°F ambient conditions, is not sufficient for testing these products. Heat loads and ambient temperatures that reflect the extreme conditions are needed to develop corresponding energy consumption levels, that are representative, without degrading performance requirements.

We appreciate EPA's consideration of our company views on the Discussion Guide.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Bauman".

Jeff Bauman
Engineering Manager