



# HOSHIZAKI AMERICA, INC.

February 16, 2022

Ms. Tanja Crk  
Product Manager  
ENERGY STAR Commercial Food Service  
US EPA  
1200 Pennsylvania Ave, NW  
Washington, D.C. 20460

RE: Comments on Final Draft Version 5.0 ENERGY STAR Commercial Refrigerator/Freezer Specification

Dear Ms. Crk,

Thank you for the draft of Commercial Refrigerator and Freezer Version 5.0. We welcome the chance to review the standard and help make sure the levels remain challenging, yet not impossible, for the top tier of models to achieve.

Below are Hoshizaki America's comments on the draft:

1. **Chef Bases.** At this time chef bases are not defined in ASHRAE 72 Method of Testing Open and Closed Commercial Refrigerators and Freezers, and they are excluded from the DOE test standard for commercial refrigeration equipment. We would welcome the DOE to address this in their test standard and definitions and then regulate the products before ENERGY STAR qualifies the products. There is concern over the ambient temperature and heat load on top of the product; this should be considered when determining energy requirements for the product when used as intended. Hoshizaki requests that industry analysis be provided to illustrate the effects of ambient temperatures and external heat loads which are vastly different between chef base applications and other commercial refrigeration applications. Hoshizaki encourages EPA to work with ASHRAE SSPC 72 and DOE to incorporate these units within the supported industry method of test after appropriate analysis is completed. Hoshizaki requests that chef bases be held off for regulation until there is an exact definition of how to test by both ASHRAE 72 and DOE.
2. **Effective Dates.** Hoshizaki America would like the effective date to be determined after the DOE determines their new standard for CRE. This would allow Hoshizaki America and other manufacturers to verify for new ENERGY STAR, DOE, and NRCAN requirements simultaneously rather than spreading over multiple projects.

Hoshizaki America looks forward to the final draft. Thanks again for all your help in this matter.

Sincerely yours,

Stephen Schaefer