



HOSHIZAKI AMERICA, INC.

September 22, 2021

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

RE: Comments on Draft 1 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 as a group 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 taken into account when determining energy requirements for the product when used as intended.
2. **Service over counter.** Hoshizaki America deems the levels fair and agrees for the addition of these models into qualification. With the DOE regulating these products, this is a fair representation of the top 20% of the market.
3. **New levels for VCS.SC.L/M.** Hoshizaki America questions whether the plots need to be reviewed for errors. There are some points on both the L and M charts that look impossible. Can ENERGY STAR review whether those points are still in the CCMS database, and can they be cross checked to verify if they are in fact freezers? Also, if a manufacturer has numerous models with the same volume and energy use but different model names (or different brand), how are these calculated for the top 20%?
4. **Refrigerant type.** Hoshizaki America welcomes the addition of refrigerant type into the listing. Our request is that manufacturers be allowed to add, at no cost, the refrigerant type when verifying currently listed models to be kept in the listing for version 5.0, Hoshizaki America does not agree to list the refrigerant charge amount, just the type of refrigerant.
5. **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