



Manufacturers of Commercial & Professional Refrigerators and Freezers

DATE:

September 22, 2021

TO:

Tanja Crk
Product Manager, Commercial Food Service Equipment
Energy Star Product Development Team
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave, NW
Washington, DC 20460

FROM:

Joe Sanders
Principal Engineer
Traulsen / ITW – Food Equipment Group, LLC
4401 Blue Mound Rd.
Fort Worth, TX 76106-1988

SUBJECT:

ENERGY STAR Version 5.0 Commercial Refrigerators and Freezers Draft 1 Specification, August 11, 2021.

Dear Ms. Crk,

Traulsen Refrigeration would like to thank the US EPA for the opportunity to comment on the proposed revisions that may be incorporated into the 5th edition of the Energy Star program for commercial refrigerators and freezers.

Traulsen is a producer of commercial refrigeration equipment with products covered by both the current “Version 4.0” and proposed “Version 5.0” specifications. Traulsen Refrigeration, a division of Illinois Tool Works Inc’s Food Equipment Group (ITW FEG, LLC) is a proud 13-year ENERGY STAR Partner of the Year and supporter of the ENERGY STAR program which promotes beneficial energy regulations. We understand the importance these programs play in advancing energy efficient appliance design and it is our sincere desire to make a meaningful contribution to their development and revision. Please accept our input as a partner and interested party in the process.

Sincerely,

Joe Sanders
Principal Engineer

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Eligibility Criteria Draft 1, Version 5.0

Lines 69 – 71:

Traulsen is in support of the proposed new and revised equipment definitions found on Lines 8 – 66.

Line 104:

The applicable UL safety standards now included standard (UL 60335-2-89). Line 104 should read as follows:

“UL Standard for Commercial Refrigerators and Freezers (UL-471) or (UL60335-2-89)”

Lines 159 – 160:

Traulsen is in support of the version 5.0 scope expansion if manufacturers are afforded the opportunity to provide EPA with a statistically significant sampling of performance data for the affected models prior to establishing energy consumption criteria.

Lines 283 – 288:

Traulsen supports using ASHRAE Standard 72 for measuring the energy usage of “CB.SC.x”, chef base models without the addition of a secondary heatload. We also believe the internal volume of chef base models should be calculated in conformance with AHAM standard HRF-1.

Lines 296 – 312:

4.2 Number of Units Required for Testing

- (ii) Units are selected for testing and results calculated according to the sampling requirements defined in 10 CFR Part 429, Subpart B § 429.42

Code of Federal
Regulations

§ 429.42 Commercial refrigerators, freezers, and refrigerator-freezers

- (a) Determination of represented value. Manufacturers must determine the represented value, which includes the certified rating, for each basic model of commercial refrigerator, freezer, or refrigerator-freezer either by **testing**, in conjunction with the applicable sampling provisions, or by applying an **AEDM** - Alternative Efficiency Determination Methods.

Question: Consistent with DOE methods, can an **AEDM** be used to calculate a certified rating rather than testing each basic model?

Alternative efficiency determination methods. In lieu of testing, a represented value of efficiency or consumption for a basic model of commercial refrigerator, freezer or refrigerator-freezer must be determined through the application of an AEDM pursuant to the requirements of [§ 429.70](#) and the provisions of this section, where:

- (i) Any represented value of energy consumption or other measure of energy use of a basic model for which consumers would favor lower values shall be greater than or equal to the output of the AEDM and less than or equal to the Federal standard for that basic model; and
- (ii) Any represented value of energy efficiency or other measure of energy consumption of a basic model for which consumers would favor higher values shall be less than or equal to the output of the AEDM and greater than or equal to the Federal standard for that basic model.

Lines 314 – 326:

5 EFFECTIVE DATE

ITW/Traulsen like many manufactures has experienced part shortages and labor interruptions throughout 2021. These challenges continue to affect the availability of some basic models. As a result, it is difficult to benchmark all equipment listed under the version 5.0 scope expansion. Traulsen would appreciate EPA’s sensitivity when establishing the timing of its “Next Steps”.