



HOSHIZAKI AMERICA, INC.

May 8, 2017

Ms. Kirsten Hesla
ENERGY STAR
US EPA
Washington, D.C. 20460

RE: Comments on Final Draft Version 3.0 ENERGY STAR Commercial Ice Maker Specification

Dear Ms. Hesla,

Thank you for the work ENERGY STAR put into this draft of Commercial Ice Maker Version 3.0. We welcome the chance to review the standard.

Below is a list of concerns and also answers to questions in your draft:

1. Thank you for modifying the effective date to January 28, 2018 to coincide with the DOE effective date.
2. Due to the changing market resulting from DOE standard changes for January 28, 2018, we suggest setting a target of 20% of the market and when the threshold exceeds 35% to review and change accordingly. Without the presence of qualified models in key 24-hr ice production points, ENERGY STAR will not achieve its goal of spotlighting the top energy savers for customers to select. ENERGY STAR qualification is looked at as mandatory in some buying sectors and to have too few models to select from would negatively impact the market. Hotels, restaurants, convenience stores, and schools depend on ENERGY STAR qualified models and associated rebates to maintain their budgets. By making standards that are too stringent, the limited selection will encourage customers to forego more energy efficient products for products with a cheaper up-front price. Areas of concern are as follows:
 - a. For remote condensing units, only a handful of units qualify. Many users choose these models for the heat to be released outside the store and not in the customer area. Please review before finalizing to see if we can adjust the standard level to get more adequate choices across the harvest range and higher penetration to market.
 - b. For batch ice-making head, the plot shows that no models qualify between 500 and 1200 pounds/day. This large of a range with no models qualifying does not adequately give choices to the public. We suggest modifying the curves to get at least 10% market penetration for such a popular segment. Restaurants and convenience stores rely on this size for their market. With no ENERGY STAR models or associated rebates available, the incentive to choose an energy saving product is greatly reduced.
 - c. For batch self-contained, only 4% of the models qualify under this section. This qualification rate is too low and should be reviewed for adequate market penetration.

- d. For continuous ice-making head, only 1 model qualifies between 600 and 2000 pounds/day. This qualification rate is too low and should be reviewed for adequate market penetration.
- e. For continuous self-contained, only 3 models qualify for this range. We need to make sure it is not too stringent between 50 and 200 lbs/day to allow for adequate market penetration.
- f. For continuous remote units with more than 800 pounds/day, no models qualify for this standard that have below a 100% ice hardness. The three units that qualify show either no adjusted energy or considerably lower than the measured value. We request ENERGY STAR to further review the data in the database and allow for qualification of true continuous ice makers for this standard along with the tube ice makers that have either 100% or greater ice hardness. Restaurant and C-stores are accustomed to continuous ice makers that have chewable ice. With the current levels, customers are not given an ENERGY STAR choice in this segment that has chewable ice (tube ice is larger and harder and not chewable). The standard has too big of a gap for any current flaked or nugget machine to achieve, only tube ice that is not chewable can achieve these levels.

We look forward to a challenging and achievable standard for Commercial Ice Makers that will give a good selection for customers while meeting the target of 20% of the market. Hoshizaki America wants to encourage the true vision for ENERGY STAR to remain that a spotlight for the top 25% of the market. In doing so the customer should be the one benefiting from an adequate choice of products across the whole range harvests, not just one or two at levels that mean nothing to their bottom line. While not a factor this round, in the future total sales should be looked at from areas like AHRI to review which harvest areas are the biggest impact to the market. Thanks again for all your help in this matter.

Sincerely yours,



Stephen Schaefer