



April 5, 2012

To: ENERGY STAR Specification Development Group

Subject: Comments on Draft 2 of Proposed Energy Star Version 3.0
Specification For Refrigerated Beverage Vending Machines

Dear Sir or Madam:

AMS is a supporter of the concepts embraced in this program and we agree that its presence has provided a great benefit to vending operators and their customers.

We have successfully adapted our high efficiency product line to comply with the current Energy Star requirements. We also maintain the separate and mandated requirements of both the California Energy Commission and Natural Resources Canada. We feel strongly that more harmonization between these various agencies should be a prime concern for everyone involved and would urge that this issue be given serious consideration.

Our customers are very interested in these Energy Star products, and the ability to continue the use of the Energy Star logo on this equipment is very important for us as manufacturers and for our customers as they present these products to the locations where the machines will be used.

Regarding machine classifications, all AMS machines can be configured to vend at least one selection of refrigerated beverage and as such they meet the present definition of a refrigerated beverage vending machine. In practice operators of our equipment typically choose to provide only from 0% to perhaps 20% of the product selections as beverages; they use the remainder of the machine capacity for other non-“sealed beverage” products.

In light of this, we agree with others in the Industry that even though there is an ever-changing mix of products stocked and sold in these machines, the energy consumption will never be greater than when tested as a Class A machine fully loaded with bottles or cans. This being the case, we would suggest that it is both in keeping with the spirit of the program and technically appropriate to eliminate the definitions and separate requirements for Class B and C machines altogether.

The introduction of refrigerated volume in the MDEC equation – in place of the product capacity – makes the removal of these machine classifications simple in terms of test criterion. Removal of these other classifications also eliminates the need to establish complex rules governing testing methods and MDEC limits when a machine is set up to vend a variety of products other than beverages.

Regarding the test method itself, we also suggest a change that would modify the requirements of the ASHRAE 32.1 test standard. The test presently requires that the average temperature on ‘next to vend’ products must be maintained at 36°F. We suggest that this be modified to require that this temperature be maintained at “the higher of 36°F or the lowest temperature setting allowed by the refrigeration control system”. Some machines do not include settings that provide average product temperatures as low as 36°F, and while this might have marketplace consequences manufacturers should be allowed to limit a machine to higher temperature settings. To do so would result in less energy consumption and that is after all the goal of this program.

Regarding the new MDEC limits, we feel that the DOE Standards impose very stringent limits on consumption – in our case, they require as much as a 15% reduction from our present Energy Star limits. We would urge that if reductions of 5% more than the DOE standards must be included as part of this program, implementation should not occur before January 1, 2014.

Thank you for your consideration,

Jim Collins
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