

December 3, 2012

Mr. Christopher Kent  
ENERGY STAR® Program Manager  
Environmental Protection Agency  
Ariel Rios Building, SW, MS 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Mr. Kent:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR Commercial Ovens Version 2 Draft 3 Specification, released by the Environmental Protection Agency (EPA) on October 12, 2012.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and eight Canadian provinces. In 2011, CEE members directed \$7.8 billion of energy efficiency program budgets in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as our national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

## Previous Comments on Combination Ovens Category

CEE submitted comment letters to EPA on Drafts 1 and 2 of this specification. In those letters (dated April 18, 2012 and August 31, 2012, respectively), we made several requests of EPA regarding the combination ovens category. We appreciate EPA's consideration of these comments, the provision of the requested context and information to CEE, and the subsequent changes made to the specification. Together, the changes made through this draft address all of CEE's comments to date relative to combination ovens, and we thank you. 2

## Require Production Capacity Reporting for All Oven Types Including Convection Ovens

EPA has added production capacity reporting requirements for combination ovens to “allow the consumer the ability to choose the oven that best matches their production needs while also comparing energy efficiency performance.” For consistency across oven types and for the benefit of all customers, we support adding production capacity reporting across all oven types including convection ovens.

Production capacity is an important dimension in understanding relative amenity and associated energy consumption. The availability of such information would enable consumers and energy efficiency program administrators to more fully understand the relative energy performance on the basis of capacity. For these reasons we recommend that EPA require production capacity reporting for all oven types and to make this information available via the ENERGY STAR qualifying products list.

## Unable to Comment on Convection Oven Performance Levels at this Point

It is our understanding that EPA is investigating how different aspects of the revised convection ovens test procedure may have impacted the data set EPA received from testing bodies. We thank EPA for its due diligence and the agency’s intent to share the data set with stakeholders upon completion of this investigation. Because of the ongoing investigation of the data and test procedure, we cannot comment on the proposed convection oven performance levels at this time. This product category represents a potentially important measure for CEE member programs, and we look forward to reviewing EPA’s analysis and the updated data set, when it is available, at as early a date as possible. We will then review and comment on the performance levels accordingly.

CEE would once again like to thank EPA for the opportunity to comment on the ENERGY STAR specification for Commercial Ovens, Version 2, Draft 3. Please contact CEE Program Manager Kim Erickson at 617-532-0026 with any questions about these comments.

Sincerely,  
Ed Wisniewski  
Executive Director