

August 31, 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 2 Specification, released by the Environmental Protection Agency (EPA) on July 18, 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.

Clarify Nomenclature and Variables

We recommend that EPA seek an alternative name for “2/3-Size” combination ovens. The “2/3 Size” subcategory name is confusing because, when considered with the other two subcategory names (1/2 and full), it implies that 2/3 ovens are larger than 1/2-size ovens and smaller than full-size ovens. This is not the case as the 2/3-size subcategory includes all ovens smaller than 1/2-size. We recommend that EPA rename this category from 2/3-size to “Less than (<) 1/2 Size”.

In addition, we recommend that EPA define the variable “P,” which is required to calculate the maximum allowable idle energy rate. It is our understanding that “P” represents the number of 12” x 20” x 2.5” steam table pans the combination oven can accommodate.

Agree with Specification Approach and Performance Levels

We thank EPA for addressing the concern about the approach and performance criteria we raised in the Draft 1 period. Our concern stemmed from CEE analysis showing a risk that several energy efficient units (on a total energy consumption basis) would not qualify for ENERGY STAR because they would not meet all four energy performance criteria: steam mode cooking, steam mode idle, convection mode cooking, and convection mode idle. EPA adjusted these criteria in Draft 2 and, based our analysis, the current approach minimizes if not eliminates the risk identified in Draft 1. We support the current approach and the proposed performance levels for the ENERGY STAR program.

We cannot speak to the anticipated level of local program support for the specification because administrators must first conduct further local market analysis. At least 10 local efficiency program administrators communicated to CEE that they plan to consider the final ENERGY STAR specification as the basis for gas or electric oven efficiency programs.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski".

Ed Wisniewski
Executive Director