

October 17, 2013

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® Version 3 Draft 2 Specification for Commercial Refrigerators and Freezers, released by the Environmental Protection Agency (EPA) on August 19, 2013.

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 seven Canadian provinces. In 2011, CEE members directed \$6.1 billion of the \$7.6 billion in energy efficiency and demand response program expenditures 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.

Draft Specification Offers a Solid Foundation for Energy Efficiency Programs

In June, we commented to EPA that we believed the Version 3 Draft 1 Specification for Commercial Refrigerators and Freezers would offer a solid foundation for energy efficiency programs. We believe that the Version 3 Draft 2 Specification continues to provide a solid

foundation for energy efficiency programs to promote high efficiency commercial refrigeration equipment in local markets.

In making this determination, CEE compared the expected energy savings and percentage of products expected to qualify based on the Draft 1 and Draft 2 specification criteria. The analysis considered energy savings by major product type and size category. We also consulted with the CEE program committee (Committee) composed of commercial kitchens energy efficiency program managers with experience testing or promoting high efficiency commercial refrigerators and freezers in local markets. The largest energy savings impacts are for vertical, solid, single-door freezers (Draft 2 levels result in approximately 300 kWh in additional annual energy savings relative to Draft 1, which equates to 38% savings compared to federal standards instead of 32% savings) and for vertical, solid, two-door freezers (about 400 kWh less annual energy savings than Draft 1, 38% savings compared to federal standards instead of 43% savings). Model qualification rates remain similar between Drafts 1 and 2, with qualification rates around 25% for all product categories and sizes. The largest model qualification impact is for solid-door freezers under 15 cubic feet, whose qualification rate rose from 11% to 33%.

Based on our analysis, we support the Draft 2 changes. The changes are consistent with the brand tenets of ENERGY STAR and provide sufficient savings potential for efficiency program administrators to support products that would qualify under Draft 2.

We Remain Interested in Exploring the Potential to Expand the Specification Scope

In our letter dated January 18, 2013, CEE recommended EPA explore an expanded specification scope to include additional equipment, such as prep tables, open display cases, and any other equipment currently subject to federal minimum energy performance standards. We recognize that a robust data set for this equipment has not yet been made available to EPA, and that EPA needs such a data set to analyze the potential for energy savings and significant product differentiation. We understand that the US Department of Energy (DOE) formed a working group to negotiate energy performance certification requirements for refrigeration equipment, and that until the certification requirements are finalized, data documenting the energy performance of federally regulated commercial refrigeration equipment is unlikely to be made publicly available. Our understanding is that the certification requirements are unlikely to be finalized in time to consider additional equipment types as part of this specification revision. We understand and support EPA's decision to delay consideration of additional equipment types until such performance data is available.

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

Sincerely,

A handwritten signature in blue ink that reads "Ed Wisniewski". The signature is written in a cursive style with a large, prominent initial "E".

Ed Wisniewski
Executive Director