

Continental

Refrigerator

September 12, 2013

Christopher Kent
ENERGY STAR Product Manager
U.S. Environmental Protection Agency
Washington, DC 20460

Subject: Specification for Commercial Refrigerators and Freezers, Version 3.0 Draft 2

Dear Mr. Kent:

After reviewing the Draft 3 Version 2.0 specification for Commercial Refrigerators and Freezers, Continental Refrigerator, as an Energy Star Partner and stakeholder in this program, would like to submit the following comments:

Alignment with DOE Regulations: The draft revisions explicitly state EPA's desire to align the standards with the DOE regulatory program. We strongly support this position and encourage EPA to utilize the definitions, reporting and certification requirements presented in the applicable portions of: Title 10, Code of Federal Regulations [10 CFR]. This will help reduce some of the burden on manufacturers to manage multiple programs, as well as provide better usage of EPA and DOE resources by eliminating duplicate efforts.

Maximum Energy Consumption: We support EPA's intention of utilizing the model definitions presented in 10 CFR §431.62. However, due to the stringent limits on maximum energy consumption to achieve ENERGY STAR qualification, EPA should consider additional factors in how a product is utilized for maximum energy consumption. Commercial refrigeration equipment is commonly sold in a variety of configurations, such as: Reach-In, Roll-In, Worktop, and Undercounter models. Based on the intended application, a product with similar storage volume can be configured very. For example, a 1-section Roll-In refrigerator, a 2-Section Reach-In refrigerator and a 72" long Worktop (refrigerator may have similar volume, but require very different construction, which are not considered under the current general product definitions. For basic energy considerations, this may not be an issue. But when these products are considered jointly for establishing a maximum allowable energy consumption that limits qualified products to 25% of models available, an imbalance can occur within types, excessively limiting customers' choices for a needed application.

Effective Date: EPA is undoubtedly aware of the open rulemaking on Certification and Enforcement, as well as Efficiency Standards for Commercial Refrigeration Equipment. Many manufacturers and interested parties are actively working with DOE through multiple public meetings and webinars to develop substantial requirements that mandate reporting of certified product information, including energy consumption ratings. While DOE has been working to complete these rulemaking activities as quickly as possible, while ensuring the best and most thorough regulations possible, these efforts are currently unresolved.

Since revised ENERGY STAR standards will directly relate to DOE rules, EPA should allow the Department of Energy to complete their work and issue Final Rules on the open rulemaking, before any changes are finalized from the current ENERGY STAR Version 2.1 standards.

We appreciate the opportunity to comment on the draft and hope our views are useful in the standards development.

Sincerely,



Jeff Bauman
Engineering Project Manager