

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

October 26, 2012

Dear ENERGY STAR® Commercial Refrigerator and Freezer Partner or Other Interested Party:

With this letter, the U.S. Environmental Protection Agency (EPA) is launching efforts to revise the ENERGY STAR Version 2.1 Commercial Refrigerators and Freezers specification. The primary objectives of this revision are to: 1) revisit the performance levels, ensuring that the ENERGY STAR continues to provide differentiation in the marketplace; and 2) align testing requirements with the latest U.S. Department of Energy (DOE) final ruling for commercial refrigeration equipment. The intent of this memorandum is to outline these primary objectives and seek stakeholder feedback on issues that will help the Agency draft the revised specification.

***Maximum Daily Energy Consumption (MDEC) Requirements***

The existing Version 2.1 specification went into effect for glass door equipment on April 1, 2009 and new requirements for solid door equipment went into effect on January 1, 2010. In just two years, market penetration of ENERGY STAR qualified refrigerators and freezers has grown significantly due to efforts by ENERGY STAR manufacturer and utility partners to design, promote, and incentivize high efficiency models. Based on EPA estimates, ENERGY STAR qualified models represented 65% of total U.S. shipments in 2011<sup>1</sup>. To ensure that the ENERGY STAR continues to recognize the top performers in energy efficiency, EPA must revisit the current ENERGY STAR requirements.

To start, EPA will use the data included in the ENERGY STAR Qualified Products List (QPL) and the California Energy Commission (CEC) Appliance Database to determine preliminary minimum efficiency levels for stakeholder review and comment in a Draft 1 Version 3.0 specification. Throughout this revision process, EPA also welcomes submission of additional data that may exist outside of these databases. EPA intends to distribute the Draft 1 Version 3.0 proposal in December 2012.

***Test Procedure Harmonization***

DOE issued a final rule adopting an amended test procedure for commercial refrigeration equipment on February 21, 2012 and compliance with that test procedure will be required concurrent with any amended energy conservation standards the Department may promulgate. 77 FR 10318. It is EPA's intention to align the ENERGY STAR test method with the DOE regulatory test method found in 10 CFR Part 431.64.

***Additional Commercial Refrigerator and Freezer Input***

Prior to issuing the initial draft of the Commercial Refrigeration Equipment specification, EPA is also interested in collecting input from stakeholders on various issues related to definitions, scope, and the potential consideration in the ENERGY STAR program of new equipment classes that correspond to those covered by DOE's regulatory program. EPA encourages stakeholders to provide input on the following subjects:

- Door opening orientation of a single product line is an allowable variation in the product family definition, but recent qualifications noted that some variations (e.g., sliding doors vs. hinged doors) may lead to different energy consumption values and measured internal volume,

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<sup>1</sup> ENERGY STAR 2011 USD Results: [www.energystar.gov/usd](http://www.energystar.gov/usd)

prompting EPA to consider this allowable variation. EPA seeks information on product models that have this type of associated variation on measured interior volume or energy performance.

- EPA understands that there are alternative natural refrigerants being used in commercial refrigeration products. EPA would like to gain a better understanding of the prevalence of such refrigerants now and expected growth, and any impacts on energy performance associated with units that use these refrigerants.
- The scope of the ENERGY STAR Commercial Refrigerators and Freezers specification currently is limited to a finite class of products, but there has been interest to expand the scope to include the other products covered by the DOE equipment classes. For each, EPA seeks energy performance and market data (e.g., prevalence, where such products are used, and usage patterns) such that EPA can evaluate their fit in this specification:
  - Display cases,
  - Hybrid refrigerators and freezers,
  - Dual temperature refrigerators.

EPA welcomes stakeholder comments on these subjects as well as any additional topics related to commercial refrigerator and freezer technology and product availability that will support this revision effort. EPA requests stakeholders input on the above topics by **November 27, 2012**, submitted to [commercialrefrigeration@energystar.gov](mailto:commercialrefrigeration@energystar.gov)

#### **Stakeholder Webinar: November 15, 2012**

EPA will host a commercial refrigerators and freezers stakeholder webinar on **November 15, 2012** from 12:00 p.m. – 2:00 p.m. (EST). Topics of discussion will include proposed changes to the commercial refrigerators and freezers specification and other stakeholder comments. Stakeholders interested in participating in the webinar should RSVP to [commercialrefrigeration@energystar.gov](mailto:commercialrefrigeration@energystar.gov) by **November 13, 2012**.

#### **Stakeholder Review and Comment Process**

Throughout the specification revision process, EPA will solicit input from all stakeholders on an ongoing basis via draft specifications, e-mail correspondence, and stakeholder meetings. All EPA correspondence and specification documents will be posted to the ENERGY STAR Commercial Refrigeration specification development webpage, which can be accessed through [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs) (click on the Commercial Refrigerators and Freezers Version 3.0 link). In addition, all written comments received by EPA will be posted to this webpage unless requested otherwise by the submitter.

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. Your input is very valuable during this specification development process.

Please feel free to contact me at (202) 343-9046 and [kent.christopher@epa.gov](mailto:kent.christopher@epa.gov) or Adam Spitz, ICF International, at (202) 862-1226 and [adam.spitz@icfi.com](mailto:adam.spitz@icfi.com) with any questions or comments regarding the specification development process or the data collection. For questions relating to the test method, please contact Ashley Armstrong at [ashley.armstrong@ee.doe.gov](mailto:ashley.armstrong@ee.doe.gov).

Thank you for your continued support of ENERGY STAR. I look forward to working with you during the specification revision process.

Sincerely,



Christopher Kent, Product Manager  
ENERGY STAR for Commercial Refrigeration