



U.S. Environmental Protection Agency (EPA)
Only by e-mail

1. Februar 2013
Brg
Telefon: 08191/327-513
Fax: 08191/32772513
E-Mail: m.breunig@RATIONAL-online.com

Comments on the Draft 3 proposal Version 2.0 Energy star® Program

1. We are not sure that energy consumption of Gas Combination Ovens will be correctly evaluated.

10.1.2 of ASTM F2861-10 rules that for Gas Combination Ovens the consumption of electric and gas energy has to be added.

Reason:

When we look at the reports number 501311101 Rational SCC WE 202G and 501310062-R0 Convotherm by Cleveland OGS 20.20 for example, we are not sure that the energy consumption in **electric and gas energy are added**, as it is not traceable in the report. In our opinion it is absolutely necessary that the complete energy consumption of a Gas Combination Oven must be base for the rating for Energy Star. We propose that the final version includes a clarifying definition.

2. Discussion about energy storage and potential impact on energy efficiency

Below 10.3 of ASTM F2861-10 is defined how to measure preheat energy consumption and time. Below 10.6.8 steam mode and 10.7.7 convection mode is defined a preheat time of 1 hour but the record of the energy consumption for preheat is not required. During this 1 hour of preheat it would be possible to load energy storage and to use the stored energy for cooking. The stored energy would not be part of the recorded consumed energy and would be able to improve results of energy consumption. We propose that the final version includes a clarifying definition, that the amount of energy for preheating is used for calculating the efficiency rates.

3. We believe that section 4. F. should include reporting of preheat times

A large amount of energy is wasted when users allow their equipment to idle ensuring a ready to cook state. True energy efficiency can only be achieved if wasted energy is reduced. Decreasing preheat times is one way to reduce daily energy consumption. Using the same rational that EPA uses to justify production capacity, with which we agree, this will allow the consumer the ability to choose the oven that best matches their production needs while also comparing energy efficiency performance.

Best regards

RATIONAL
Aktiengesellschaft

i.V. Manfred Breunig