



SUB•ZERO GROUP, INC.

4717 Hammersley Road, Madison, WI 53711

P: 800.532.7820 P: 608.271.2233 F: 608.270.3362

May 30, 2013

Ann Bailey
ENERGY STAR Labeling Branch Chief
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Program Requirements, Product Specification for Residential Refrigerators and Freezers Final Draft, Version 5.0 and Final Draft Test Method to Validate Demand Response

Dear Ms. Bailey:

Sub Zero-Wolf Inc. appreciates the opportunity to submit written supplemental comments in response to EPA's Final Draft Version 5.0 Energy Star Specification for refrigerators, refrigerator-freezers and freezers. Sub Zero is a family-owned company that has been headquartered in Madison, Wisconsin for over 65 years. As we mentioned in previous comments, while technically not a small business, we are significantly smaller than the majority of major appliance manufacturers located both in the U.S. and worldwide. Sub Zero developed the niche market for customized built-in refrigerators and freezers and manufactures these, as well as Wolf cooking products, solely in the U.S., in Wisconsin and in Arizona.

Sub Zero is committed to the Energy Star program and welcomes the opportunity to continue to participate when the proposed levels are enacted. As we have mentioned in previous comments, our business is in built-in refrigeration products so we particularly appreciate EPA's efforts to add built-in product classes for refrigerators and freezers in Energy Star specifications. Further, we were gratified to see that EPA decided to specify a constant percent improvement over DOE Standards for all products, including built-ins. There is precedent and good sense in setting one efficiency improvement target for all refrigerator and freezer product classes. Since built-in products face particular technical challenges, these decisions by EPA will enable Sub Zero to continue to actively participate in Energy Star.

In addition, Sub Zero endorses and fully supports the joint comments filed on behalf of Electrolux Home Products, Inc., General Electric Co., Whirlpool Corp. and Sub Zero, all of whom have production facilities in the United States and manufacture a wide range of refrigerators and refrigerator-freezers for sale in the U.S. and for export. All have been Energy Star partners for many years and several have been recognized by EPA for their contributions to the program. In those comments, we ask that Energy Star once more consider the many valid reasons for postponing the effective date to coincide with the new DOE minimum energy standards on September 15, 2014.

While the effects are sometimes hard to quantify, the overall regulatory burden associated with meeting a myriad of standards, regulations, labels and voluntary programs both here and abroad puts a significant



SUB-ZERO GROUP, INC.

4717 Hammersley Road, Madison, WI 53711

P: 800.532.7820 P: 608.271.2233 F: 608.270.3362

financial and resource burden on manufacturers, especially on smaller companies such as ourselves. Ironically, what is often slowed in these situations is the innovation in new product development which leads to better performing, energy saving products, the very essence of the Energy Star Program.

Our companies are investing billions of dollars to design and manufacture refrigerators and freezers that will comply with the 2014 DOE standards. Creating entirely new platforms is the only cost-effective way to achieve efficiency levels of this magnitude for all models. For companies such as Sub Zero, which due to our smaller size must compete with limited resources and manpower, this undertaking is enormous and limits our ability to do just about anything else.

Recognizing the cost and effort required to achieve new DOE levels, EPA almost always has set the effective date of new Energy Star specifications later than the federal minimum standard compliance date. The joint comments fully explain why the new 2014 Energy Star levels should not precede the DOE minimum standards. In fact, considering the complexity of transitioning to a new test procedure, implementing revised FTC labels, and explaining to our customers why the new products are saving significant amounts of energy although the labels do not seem to say so, it is probably more important this time than ever not to cause added confusion. Also, as outlined in the joint comments, an unintended consequence could even be a net increase in energy consumption during the transition; something none of us want to see happen.

Therefore, we would sincerely appreciate reconsideration by EPA staff of the facts and data supplied by the industry, even at this late hour of deliberation. Sub Zero believes a six month shift in the implementation of the new Energy Star levels will lead to a clearer, stronger program, positioned well for the future and which will save significant national energy and be embraced by the general public and all stakeholders.

Respectfully Submitted,

Paul V. Sikir
Vice President, Sub-Zero Design Engineering

Cc: Kevin Messner, VP Government Affairs, AHAM
James Bakke, President, Sub-Zero Group Inc.
Richard Topping, Government Relations, Sub-Zero Group Inc.