

Hi Becky,

You have probably already received the notification of my recent change of position from ASTM regarding sub-committee voting balance. As before, I intend to recommend rational solutions for the Energy Star Program.

Royal Vendors appreciates the opportunity to comment on Version 3.0: Draft 1 of the Energy Star Program Requirements for Product Specification for Refrigerated Beverage Vending Machines. As a long term Energy Star partner we are committed to energy improvements to our equipment.

First, we agree with the proposal to harmonize the definitions, metrics and test procedures with the DOE Final Rule. This will allow us to better support Energy Star submissions.

Fundamentally, Royal Vendors reiterates the position that was taken back on 4/21/2011 that Energy Star Tier II program be a "Sun Setting" event for New OEM Manufactured Equipment. In addition we recommended keeping the Tier II level active for all re-manufactured equipment manufactured or installed prior to the effective date of DOE 2012. Given that we still stand by our original position Royal Vendors does have additional input regarding the draft document.

Royal Vendors does believe that the Energy Star program should be retired for Class A equipment. We agree that the opportunity (within this class) for additional energy savings over the DOE program is limited.

We also believe the Energy Star and the EPA should make an allowance for equipment that uses refrigerants with a GWP (Global Warming Potential) less than or equal to one ($GWP \leq 1$). Use of these refrigerants (non-HFC systems) is gaining momentum however; the level of technology is not as advanced for these refrigerants as with HFC134a and therefore achieving energy use similar to the current Tier II levels is a challenge for manufacturers.

Royal Vendors wants to support the movement away from HFC refrigerants but if Energy Star approves this draft of version 3 for all vending equipment and refrigerants across the board it will stifle the implementation and development of these alternatives. We suggest that Energy Star support the development and implementation of the new low GWP refrigerants. One option would be to maintain Tier II levels (or scheduled DOE levels of energy use) for equipment that use refrigerants with a $GWP \leq 1$.

Additionally, while Royal Vendors does see an opportunity for Type B machines to implement a more stringent minimum efficiency standard for equipment that use HFC refrigerants, we recommend that the reduction of energy use be substantially less than the proposed 20%. The proposed value of 20% energy use reduction will delist close to 80% of our current products which would be a large impact and a hardship to our business. Also we recommend that the date of implementing version 3 be set to August 2013, one

year later than what is proposed. This will allow Royal Vendors to support the DOE's directive as well as time to support the EPA with their more stringent minimum.

Thank you for the opportunity to supply our comments. Please feel free to contact us with any questions.

Best Regards,

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