

Summary and Response to Stakeholder Written Comments
ENERGY STAR Automatic Commercial Ice Makers Version 2.0 Final Draft Specification

Issue Number	Topic	Comment	Response
1	Definitions	One stakeholder recommends EPA consider organizing machines into categories based on typical applications (e.g., beverage and non-beverage) within which certain ice characteristics are more consistently valued.	EPA has chosen to move forward with categorizing ice makers into continuous and batch groups due to the presence of clear design and ice product distinctions. Although continuous machines vary greatly in ice hardness, by normalizing for this attribute, system efficiencies may then be compared within one continuous group.
2	Criteria	One stakeholder recommends that EPA not normalize continuous type ice makers by ice hardness because this is an amenity not typically valued by the end users, and may result in unintended consequences such as not enabling the selection of the most efficient machine for the desired use.	EPA aligns with DOE in its approach to normalize energy consumption by ice hardness for continuous-type ice makers. EPA agrees with DOE that energy use is directly related to ice hardness and that normalizing the energy use by ice hardness provides a level playing field where energy use can be compared with a performance level set in the specification. EPA will provide the adjusted and un-adjusted energy use results on the Qualified Product List (QPL) for consumer use.
3	Criteria	One stakeholder believes that the ENERGY STAR levels result in qualification rates that are too high within the respective technology platforms (IMH, RCU, SCU) to utilize for efficiency program purposes.	EPA recognizes that the qualification rates for continuous type systems are higher than traditionally targeted by ENERGY STAR. Using the ENERGY STAR guiding principles, EPA continues to support the proposed levels which serve to balance product availability, consumer choice, and performance differentiation in the market place.
4	Criteria	One stakeholder commented that the RCU batch units were not well represented above 1600 lbs/day and would like 4 units above 2000 lbs represented in the final specification.	EPA believes that the adjustments made to the level lines in the Final Draft for RCU Batch systems provides adequate consumer choice in the high capacity range above 1600 lbs/day.
5	Scope	Several stakeholders expressed that RCU units designed for connection to remote rack compressors be excluded being that the market for these is very small, the test method would be difficult to perform, and that EPA should align with DOE's ruling that they do not meet the statutory definition of an ACIM.	EPA believes that it is appropriate to include RCU systems designed for connection to remote rack compressors only if the same model is offered with a dedicated condenser. DOE has developed a Final Test Method that clarifies that these systems must be tested with the least efficient dedicated condenser that it is normally sold with.
6	Scope	One stakeholder commented that EPA include only RCU's designed for connection to rack compressors that can be alternatively sold with a dedicated condenser and testing with the least efficient condensing unit sold is representative of performance and fair.	