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June 27, 2013

Mr. Christopher Kent
ENERGY STAR® Program Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Kent:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR® Version 3 Draft 1 Specification for Commercial Refrigerators and Freezers, released by the Environmental Protection Agency (EPA) on May 6, 2013.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and seven Canadian provinces. In 2011, CEE members directed \$6.1 billion of the \$7.6 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as our national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

Draft Specification Offers a Solid Foundation for Energy Efficiency Programs

In 2013, through our annual survey of CEE member commercial kitchens programs, CEE identified 61 member programs offering financial incentives to purchase high efficiency commercial refrigerators and/or freezers. We believe that the Version 3 Draft 1 Specification for Commercial Refrigerators and Freezers offers a solid foundation for these and future energy efficiency programs to promote high efficiency commercial refrigeration equipment. In making this determination, CEE analyzed the data set, plots, and retail pricing information provided by EPA and consulted with a CEE program committee composed of commercial kitchens energy efficiency program managers with experience testing and/or promoting high efficiency commercial refrigerators and freezers in their local markets. We considered the energy savings potential of products that would meet the specification, the retail price differential of qualifying models, and expected product availability. We found that qualifying refrigerators and freezers would result in significant energy savings at little or no extra cost to end users and that for most product types and sizes, end users will be able to choose qualifying products from among several models made by multiple manufacturers.

Given the findings above and additional input from eight leading commercial kitchens program administrators about expected specification adoption, we anticipate that the majority of CEE member program administrators with existing commercial refrigeration programs will propose to their management or regulators moving to the new levels once they take effect. However, some CEE members expressed that they are unlikely to be able to provide financial incentives to customers for the purchase of equipment

meeting the proposed ENERGY STAR levels because without an incremental price differential between qualifying and non-qualifying models, they are unable to justify incentives to regulators. CEE is currently exploring a revision to its Commercial Kitchens Initiative that includes consideration of several important elements such as recommended performance tiers, participating program commitments and market strategy. In the context of its Commercial Kitchens Initiative and process, CEE will explore the potential for a complimentary specification to ENERGY STAR's that would address members' needs and identify higher efficiency equipment that may come with a retail price differential for end users.

We Remain Interested in Exploring the Potential to Expand the Specification Scope

For reasons articulated in our letter dated January 18, 2013, CEE supports EPA's exploration of the potential to expand the scope of the commercial refrigeration specification to include additional equipment, such as prep tables, open display cases, and any other equipment currently subject to federal minimum energy performance standards. We understand that EPA requires, among other things, defined test procedures and performance data to analyze the technical fit and potential for adding equipment to the ENERGY STAR program. As EPA requested in its memo dated May 6, 2013 that stakeholders contact the US Department of Energy (DOE) regarding test procedure questions, we will contact DOE about the availability of test procedures for prep tables. In addition, it is our understanding that DOE is in the process of requiring commercial refrigeration manufacturers to submit energy performance data in order to demonstrate compliance with federal minimum standards. We will also contact DOE about the expected availability of these data to inform the ENERGY STAR process.

CEE would once again like to thank the EPA for the opportunity to comment on the Version 3 Draft 1 Specification for Commercial Refrigerators and Freezers. Please contact CEE Program Manager Kim Erickson at 617-532-0026 with any questions about these comments.

Sincerely,

Ed Wisniewski
Executive Director