



Comments to EPA on Draft 2 Version 5.0 of Refrigerator Energy Star Specification

Submitted by

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March 23, 2012

Submitted via email to appliances@energystar.gov

Sub Zero-Wolf Inc. again appreciates the opportunity to submit written comments in response to EPA's 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 our comments of December 15, 2011, 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.

We sincerely appreciate EPA's efforts to expedite its assessment of the need to add built-in product classes for refrigerators and freezers in this and subsequent Energy Star specifications. Sub Zero is committed to the Energy Star program and welcomes the opportunity to continue to participate. As we mentioned in our comments, and what was confirmed in DOE's recent Standards Rulemaking, is that built-ins offer distinct utility to certain customers but have significant design differences which make subsequent strides in energy efficiency more costly and difficult. While we accept the very real challenge to continue to strive for Energy Star performance in our best products, corrections are needed to level the playing field. The adders proposed by EPA of 22 kWh/yr for bottom mount refrigerator-freezers (we do not manufacture top mounts) and 45 kWh/yr for side-by-sides, do not remove the challenge but give us more reasonable expectations that we can design and manufacture products that will meet Version 5.0 levels.

We would ask that EPA reconsider the decision not to propose adders for built-in all-refrigerators and upright auto defrost freezers. While there may be a very limited number of products in the field that meet Version 5 requirements, the process of redesigning many models and producing them in high volumes is very different from having a few super efficient products appearing in the marketplace. We propose that EPA extend the 22 kWh/yr adder to built-in all-refrigerators and the 45 kWh/hr adder to built-in auto defrost upright freezers. We note that the proposed improvements for upright auto defrost freezers are, as a percentage, the most stringent proposed by EPA. Given the nature and cost structure of the freezer industry, manufacturers are going to be challenged to meet 2014 Federal standards for the fleet. Meeting particularly tough new Energy Star levels in advance of 2014 will be extremely difficult. For built-in freezers, issues are compounded as we have previously discussed. Therefore a 45 kWh/yr adder would increase the probability that a reasonable number of built-in products could be redesigned on short notice to meet required Version 5.0 levels.



Regarding Version 6.0 Energy Star levels, we understand that EPA will address this issue at a later date. We recommend that EPA work closely with DOE and the industry in understanding the impact of the changes in the 2014 test procedure and particularly in developing crosswalk relations to compare current levels with the new. EPA's use of the hyperbolic tangent relations will further complicate the transition and could lead to unintended consequences unless fully analyzed and understood.

As before, our company welcomes the opportunity to discuss with and provide to EPA more detailed information before the final Version 5.0 specification is published.

Respectfully Submitted,

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