

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

November 20, 2013

Dear ENERGY STAR® Commercial Steam Cooker Partner or Other Interested Party:

With this letter, the U.S. Environmental Protection Agency (EPA) is informing you of the Agency's interest in evaluating an alternate approach to verification testing for commercial food service (CFS) products, through an initial assessment project for Steam Cookers. EPA has elected to investigate the possibility of an alternate approach first with Steam Cookers due to their relative simplicity compared to other commercial food service products. This letter outlines the impetus for this work and relays how interested stakeholders can participate. Your participation is critical to evaluating this alternative approach.

As of January 1, 2011, ENERGY STAR products must be certified by an EPA-recognized certification body (CB). Subsets of these products, as well as products qualified prior to January 1, 2011, have also been subject to ENERGY STAR verification testing. The verification testing for CFS equipment presents challenges unique to this industry given the product size, product production, and sales volumes compared to other equipment categories in other industries. Because of these challenges, EPA is considering a different approach to verification testing of CFS equipment involving component level reviews, as is done for safety and sanitation certification purposes.

The primary challenge with component level review is ensuring the same level of accuracy in verifying product performance as actual testing. While we understand that for safety purposes, the safety of the end product can be tied to the safety of specific components, regardless of how those components are integrated, the same correlation has not yet been established for energy efficiency of products. During this assessment, EPA will explore the extent to which aligning the ENERGY STAR requirements with current safety and sanitation component level review approaches might be effective in predicting changes in efficiency performance, such that products sold into the marketplace continue to perform at ENERGY STAR levels as established during initial certification. It is worth noting that during an initial review of this option, EPA received feedback from certification professionals that a component level review would likely not ensure the same level of accuracy as verification testing of the end product.

Over the coming months, EPA anticipates working closely with interested stakeholders to flesh out and test a possible alternate verification approach. The Agency has decided to further evaluate the viability of this alternative by first identifying the critical components for Steam Cookers that would impact the ability to achieve the ENERGY STAR performance levels, as well as researching reporting and tracking protocols for inspections. Issues such as control algorithms and component integration and installation will be fully explored as well.

EPA expects this work to be completed via a limited set of conference calls and invites your participation. The Agency is first seeking input on a list of critical commercial steam cooker components (i.e., that impact energy and/or water consumption) for consideration, and comments on any additional information that might contribute to this development effort. Please share this feedback by **December 20, 2013** to commercialsteamcookers@energystar.gov.

EPA will host a webinar to discuss this assessment and the above topics on **December 18, 2013** from 12:00 p.m. – 2:00 p.m. (EST). Please RSVP to commercialsteamcookers@energystar.gov by **December 16, 2013 if you wish to participate.**

All comments received will be posted to the ENERGY STAR Product Development website, unless the submitter specifically requests that his or her comments remain confidential.

Please feel free to contact me at (202) 343-9046 and kent.christopher@epa.gov or Adam Spitz, ICF International, at (202) 862-1226 and adam.spitz@icfi.com with any questions or comments about the pilot or next steps. I look forward to working with you over the next several months on this effort.

Sincerely,

A handwritten signature in black ink that reads "Christopher Kent". The signature is written in a cursive style with a large initial "C".

Christopher Kent,
ENERGY STAR Product Manager
Commercial Steam Cookers