



... denn der Unterschied liegt im Detail!

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17. August 2012
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Comments on the Draft 2 proposal Version 2.0 Energy star® Program

1.

- a) We propose the total consumption of gas appliances is determined from:
converted gas consumption + electric consumption.

Reason:

Units which use two methods of steam production (e.g. low power one of electric type and spraying type on gas fired heat exchangers) should either classified in a own class or the total consumption (see point b) of both energy types has to be used as the value for energy efficiency requirement. At least one manufacturer for this oven type is the well-known Italian company **GIORIK**

(<http://www.giorik.com/news.php?id=17&lang=en>).

The company is part of **Standex Food Service Equipment Group** and has become the exclusive distributor of its Steambox Combi ovens in North America (United States, Canada and Mexico under the trademark of **BKI- Worldwide**(<http://bkideas.com/>).

- b) If the current collected data's for energy efficiency rates contain such models they have to be removed.

2. Some additional comments:

Section 2) Scope, Part B. Excluded Products: Why are 6 pan gas units being excluded? There are three different manufacturers 6 pan units represented on the state of California rebate qualification list. **We propose :Half-size pan capacity ≥ 5 und ≤ 44 .**

Section 3) Qualification Criteria, Part A. Cooking Energy Efficiency and Idle Energy Rate Requirements, Table 2: The capacity should be considered as written in ASTM F1495 for Combination Ovens.

Section 4) Test Requirements, Part G. Additional Test Reporting Requirements: Preheat time should be included as it helps the consumer decide if energy used for idle is a relevant factor.

Best regards

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