



U.S. Environmental Protection Agency (EPA)
Only by e-mail

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Comments on the Draft 4 proposal Version 2.0 Energy Star® Program

1. Correct evaluation of energy consumption for Gas Combination Ovens:

Section 3, Point C, on page 5: We understand that only gas energy will be included in the idle rate results; what happens for the cooking efficiency test? Why is the electric energy consumption not reported? F2861-10 (10.1.3) makes no difference between these tests. In case of "hybrid" steam production units like the BKI/Giorik models, we propose that these units are excluded from the data collecting until both electric and gas energy are added. Remark: These gas units will meet Energy Star values easily if they produce the steam by using electric energy

2. Operating temperature range for testing:

Section 4, Point G, on page 6: The temperature range shall be 212+/- 5° F. This was changed during the last ASTM meeting; therefore the draft is not in line with ASTM F-2861-10. We propose to use the same range as ASTM F-2861-10.

3. Reporting of preheat times:

Section 4, Point H, on page 6: A large amount of energy is wasted when users allow their equipment to idle for the purpose of ensuring a ready to cook state. In our opinion, decreasing pre-heat times and thus the need to idle is sensible way to reduce daily energy consumption and should not be disregarded. Using the same rational that EPA uses to justify production capacity, with which we agree, this will allow the consumer the ability to choose the oven that best matches their production needs while also comparing energy efficiency performance.

Kind regards

RATIONAL
Aktiengesellschaft

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