



**SUB ZERO GROUP, INC.**

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April 12, 2013

Via E-Mail

Katharine Kaplan  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

Re: ENERGY STAR Program Requirements, Product Specification for Residential Refrigerators and Freezers  
Final Draft, Version 5.0 and Final Draft Test Method to Validate Demand Response

Dear Ms. Kaplan:

Sub Zero-Wolf Inc. again appreciates the opportunity to submit written comments in response to EPA's Final Draft 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 previous comments, 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 Phoenix, Arizona.

As we have mentioned in previous comments, we sincerely appreciate EPA's efforts to add built-in product classes for refrigerators and freezers in Energy Star specifications. Sub Zero is committed to the Energy Star program and welcomes the opportunity to continue to participate. Further we were gratified to see that EPA now has decided to require a constant percent improvement over DOE Standards for all products, including built-ins. There is precedent and good sense in setting one efficiency improvement target for Energy Star for all refrigerator and freezer product classes.

In addition, Sub Zero endorses and fully supports AHAM's comments submitted in response to the Final Draft Version 5.0. This would include AHAM's suggested resolution to the apparent anomaly concerning Product Classes 5A, 5A-BI, 7, and 7-BI. Also, for the reasons outlined in AHAM's comments and several face-to-face meetings with EPA Staff, we would ask that Energy Star once more consider the many valid reasons for postponing the effective date to coincide with the new Federal Standard. In addition we endorse AHAM's comments as they relate to the Final Draft Test Method to Validate Demand Response

While the effects are sometimes hard to quantify, the overall regulatory burden associated with meeting a myriad of standards, regulations, labels and voluntary programs both here and abroad puts a significant financial and resource burden on manufacturers. Ironically, what is slowed due to this situation is innovation in new product development, the very essence of the Energy Star Program.

Very truly yours,

Paul V. Sikir  
Vice President, Sub Zero Design Engineering

Cc: James Bakke, President, Sub Zero-Wolf Inc.  
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Jennifer Cleary, Director, Regulatory Affairs, AHAM