



SUB-ZERO GROUP, INC.

4717 Hammersley Road, Madison, WI 53711

P: 800.532.7820 P: 608.271.2233 F: 608.270.3362

Comments to EPA on Draft 3 Version 5.0 of Refrigerator Energy Star Specification

Submitted by

Sub-Zero Group Incorporated

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Submitted via email to appliances@energystar.gov

Sub-Zero Group 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 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 Arizona.

We sincerely appreciate EPA's efforts to add built-in product classes for refrigerators in Energy Star specifications. Sub-Zero is committed to the Energy Star program and welcomes the opportunity to continue to participate. However, we do not understand and are extremely disheartened by EPA's apparent turn-around from Draft 2 to Draft 3 in specifying that built-ins require a larger efficiency improvement (13%) over the 2014 Standard than all other refrigeration products (10%).

We believe that there is precedent and good sense in setting one constant efficiency improvement target for Energy Star for all refrigerator product classes. Fundamental design, performance and efficiency differences by product class are best handled by DOE in its comprehensive technical analyses that develop minimum efficiency standards. In the EPA/DOE Memorandum of Understanding, EPA acknowledges DOE's expertise in design analysis and testing such that products are regulated on an even playing field. We do not feel that it is in the country's best interests for EPA to "second guess" DOE's determination of what credits were warranted in 2014 for built-ins due to fundamental design differences.

We also see no reason for EPA to single out for added stringency a group of products that represent well less than 2% of the market and have historically had far fewer Energy Star sales than conventional free-standing products.

We would ask that EPA reconsider the decision to require a higher improvement requirement for built-in refrigerators than all other refrigerator product classes. The Energy Star improvement requirement should be set at 10% for all refrigerator product classes.

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,

Paul Sikir

Vice President, Sub-Zero Design Engineering

Cc: Kevin Messner, VP Government Affairs, AHAM
James Bakke, President, Sub-Zero Group Inc.
Richard Topping, Government Relations, Sub-Zero Group Inc.