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**Manufacturers of Commercial & Professional Refrigerators and Freezers**

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**From:** Joe Sanders, Principal Engineer  
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**Subject:** Comments, ENERGY STAR Commercial Refrigerators and Freezers Draft 1 Version 3.0 Specification

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Please find below Traulsen's response or commentary to EPA's Energy Star Draft 1 Version 3.0 Specification for commercial refrigerators and freezers. We have taken great care in its preparation and know it contains many insightful observations and suggestions. Traulsen believes the Energy Star program continues to have a meaningful purpose in providing energy efficiency data for commercial refrigerators and freezers to potential purchasers and/or end users. With this being said, Traulsen also continues to be a strong supporter of the program. Below are a summary of our comments.

1) Definitions:

- a. Traulsen supports EPA's use of industry standard definitions as outline in 10 CFR 431.62.
- b. Traulsen also supports the elimination of the "as-shipped" term and test specification as related to the IAT – "integrate average temperature" of the simulated product packages. Therefore we support the standardized product temperatures sighted by DOE and outlined in AHRI-1200.

2) Scope:

- a. Traulsen is in agreement with EPA to maintain the current scope of products covered by the Version 3.0 specification.
- b. As the current Version 2.1 or future Version 3.0 specification does not included a criteria for "refrigerator-freezers", to eliminate confusion we suggest all references to this group be removed from the specification. Example heading of "Table1"

3) Maximum Daily Energy Consumption Requirement:

Traulsen understands EPA's desire and rational for proposing new higher performance levels on covered products to differentiate the market with the Energy Star brand.



4) Test and Reporting Requirements:

Traulsen appreciates and supports EPA's desire to align testing and reporting requirements with those of the DOE.

Traulsen would once again like to offer EPA the use "Free of Charge" of an Environment Test Chamber to perform energy audits on any number of commercial refrigerated products of your choosing. Traulsen is part of UL's Client Test Data Program, Certified by the State of California to perform energy consumption evaluations and the only US commercial refrigerated cabinet manufacturer certified by NSF International to conduct un-witnessed performance tests for food safety. Our laboratory is state of the art and staffed by a team of engineers and technicians with over eighty years of combined experience in the commercial refrigeration industry.

I hope you find the comments helpful in preparing the "Version 3.0" specification of the Energy Star standard for Commercial Food Service Refrigeration Equipment. Thanks, again for the opportunity to comment.

Sincerely,

Joe Sanders,  
Principal Engineer

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