

Dear Energy Star,

I attended the Webinar and had a few comments.

- From my conversations with appliance dealers, it seems that new refrigerators are lasting a lot less than 17 years. With shorter life, imbedded energy becomes more significant.
- When this plan is implemented the average cost of electricity will probably be over \$0.108/KWH. Suggest increasing the cost of electricity in calculation.
- As refrigerators become more efficient it will be less cost effective to load shed a refrigerator. A 270 KWH/year refrigerator only consumes 31 watts on average. A fringe benefit of energy efficiency is that it should simplify energy management practices.
- On energy star models or all models the defrost heater could be programmed to always come on at off peak hours.
- When calculating adjusted refrigerator volume. The figure 1.63 accounts for the extra heat leaking into a 5 deg F freezer (compared to a refrigerator) in a 90 deg F room. This figure would be 2.0 in a more commonly encountered 70 deg F. Removing 1 Btu of heat from the freezer compartment requires about 1.7 times more energy than removing a Btu of heat from the refrigerator compartment. The volume adjustment factor for a freezer may be as high as 3.4. We suggest increasing the correction factor. We manufacture a model which is half freezer and half refrigerator, this unit saves energy by often making it unnecessary to buy a separate freezer. If the volume correction for this model was more realistic it could be Energy Star rated.
- Refrigerator performance is being optimized for a 90 deg F environment. Kitchens are typically closer to 70 deg F. Two factors which are optimized for 90 deg F are cap tube size and system charge. These factors can have a significant effect on energy consumption. I would like to see consideration given as to how more realistic test standards could save additional energy

Sincerely,

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