

## **U-Line Corporation Comments on the ENERGY STAR Version 5.0 Refrigerators and Freezers Specification Framework Document**

The following comments are submitted on behalf of the U-Line corporation in response to the Energy Star V5.0 Framework Document.

- Sunsetting the compact product class(page 2)-U-Line would oppose sunsetting the Energy Star class for compact refrigerators. While Energy Star rebates are not generally available for this product class it is a good tool to separate the various efficiency level choices on the market. Removing this option could negatively impact sales as customers would be unsure why these types of product would no longer have this option available.
- Wine and Beverage units(page 3)-U-Line would support addition of wine and beverage product to energy star categories. This would allow separation in the market and identify the top performers. Furthering that option the main differentiation between typical refrigerators and products in these classes is the glass door. A much more efficient option would be to allow an “adder” for glass doors on all product categories similar to the current ice maker proposal. Glass doors typically use more energy than foam doors so a simple “adder” in this category would streamline the requirements and allow for energy star models with both solid and glass doors.
- Low GWP (page 6)-U-Line strongly objects to the requirement of combining the energy star program and low GWP foam products. The effect on small manufacturers such as U-Line is a significant cost to produce this type of product. In order to be cost effective a change of this nature must be made across the entire plant-not just for energy star product.
- Smart Grid(page 9)-U-Line would object to requiring smart grid enabled appliances only for energy star consideration. The cost justification for the energy savings on a refrigerator could not be demonstrated to a consumer for the energy that would be saved. U-Line would agree that an acceptable approach would be to allow for a 5% adder for refrigerators with this functionality. The type of interface must be kept simple in order for manufacturers to implement this at a low cost-making it a viable alternative for consumers.
- Additionally in regards to Appendix Table 1 U-Line would disagree with the impact of certain features in relation to compact refrigerators specifically. While larger product may have options available in Variable Speed Compressors and improved efficiency compressors those are very limited to non-existent in the 300-500 BTU/Hr range that many compacts use. Other technologies such as VIP panels and DC fans are not as viable an option to smaller manufacturers due to costs at low volumes as well.