May 2, 2007

Rebecca Duff ICF International rduff@icfi.com

Re: ENERGY STAR Draft Specification for Ice Makers

Dear Rebecca,

I have reviewed the Draft 1 specification and offer the following comments.

NRCan recently issued a bulletin proposing to increase the minimum efficiency levels for ice-makers in Canada's EE Regulations. NRCan expects to adopt levels equivalent to CEE Tier I and CEC 2008 levels. As in the preparation of the draft ENERGY STAR specification, NRCan's analysis was done using the ARI database of reported equipment. We found that few products would qualify at CEE Tier II levels. It appears that the proposed ESTAR levels are about midway in the range between CEE Tier I and II, so NRCan agrees with the minimum efficiency levels that are proposed in the draft specification.

We also agree that flakers and water cooled models need not be included in the ENERGY STAR specification.

Regards,

Brian Killins Senior Standards Engineer Office of Energy Efficiency Natural Resources Canada

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