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Comments to EPA on Energy Star Program Requirements for Commercial Refrigerators and Freezers Specification Version 2.0 - Draft 1.

April 21, 2007

Rachel Schmeltz
c/o Bijit Kundu, ICF
ENERGY STAR Program Manager
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1200 Pennsylvania Avenue, NW
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Dear Rachel:

CEE appreciates the opportunity to provide comments on the ENERGY STAR specification for Commercial Refrigerators and Freezers (Version 2.0 - Draft 1). The Commercial Kitchens Committee (the Committee) recognizes the impact that ENERGY STAR® has on the promotion of efficient products in the industry and applauds its efforts. The Committee was pleased to see this specification clarify eligibility, provide more stringent requirements, and expand the classes of equipment eligible to receive ENERGY STAR. The following comments address each of the areas on which ENERGY STAR requested feedback.

Revising Average Product Temperature for Ice Cream Freezers:

The Committee supports the revision of average product temperature to be consistent with Federal regulations.

Definitions of Commercial Refrigerators and Freezers:

The Committee requests clarification on the definitions regarding the intent for storage of food products. Specifically, it is unclear as to whether units intended solely for pre-packaged or bottled food products, such as beer and wine, are included in this specification (e.g., back bar coolers and similar equipment). We recommend ENERGY STAR cite the appropriate National Sanitation Foundation (NSF) certification to more clearly differentiate those food products, and hence storage units, intended to be covered.

Use of ANSI/AHAM HRF-1-2004 and ASHRAE Test Method

The Committee supports the use of test procedures that industry has previously adopted and endorsed, such as these methods, and we see no issues at this time regarding application of the ASHRAE test method to this class of equipment.

Addition of Sliding Doors

The Committee supports the inclusion of sliding, solid-door units at the same specification level as hinged, solid-door units.

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Glass Door Cabinets

The Committee was happy to see the addition of glass door cabinets to the specification. As with Commercial Refrigerators and Freezers, we recommend ENERGY STAR cite the appropriate NSF certification to more clearly differentiate those food products, and hence storage units, intended to be covered.

Breaking Down Performance Requirements by Volume Categories

The Committee understands that a guideline for ENERGY STAR is to have approximately 25% of models in all sizes qualify. We would like ENERGY STAR to explain the relationship between energy performance and size to better understand the basis for determining the proposed size categories.

Specification Sheets

The Committee supports the requirement for product specification sheets to be attached to QPI forms.

Timeline

The Committee supports the timeline for the new specification requirements.

Once again, CEE would like to thank the EPA for the opportunity to comment on the ENERGY STAR specification for Commercial Refrigerators and Freezers (Version 2.0 - Draft 1). Please contact CEE Program Manager, Kim Erickson, at 617-589-3949, ext. 234 with any questions about these comments.

Sincerely,



Marc Hoffman
Executive Director