

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

February 14, 2008

Dear ENERGY STAR<sup>®</sup> Solid Door Refrigerator and Freezer Partner or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the following Draft 1 Version 2.0 ENERGY STAR specification for commercial refrigerators and freezers. The current ENERGY STAR specification for this equipment has been in place since September 2001 and market share of qualified models has been steadily growing. In addition, in 2005 Congress passed new Federal minimum efficiency standards that require all solid door refrigerators and freezers to meet the equivalent of current ENERGY STAR levels as of January 1, 2010. To ensure that ENERGY STAR continues to represent the top performers in terms of energy efficiency, the U.S. Environmental Protection Agency (EPA) is revising the current ENERGY STAR specifications for solid door refrigerators and freezers to establish new performance levels. In addition to revising the existing performance levels, EPA is also interested in expanding the list of product types eligible for ENERGY STAR qualification.

In developing the Draft 1 Version 2.0 proposed requirements, EPA consulted several sources including the ENERGY STAR qualified product list, the California Energy Commission Appliance Efficiency Database, and the Consortium for Energy Efficiency Qualified List. Some of the key revisions of this specification include:

- Proposed new energy consumption levels based on volume ranges. This new volume approach is being proposed in response to concerns that the current specification requirements do not provide adequate model availability of smaller sized equipment. The proposed new performance levels represent approximately 25% of the models available in the marketplace for each product type and volume category.
- Addition of sliding door units, glass door units, and drawer cabinets as new categories eligible for qualification. EPA is proposing to include these new product types based on manufacturer interest and/or availability of performance data.
- Adjustment to the integrated average product temperature for testing ice cream freezers from -5 degrees F to -15 degrees F to align with the Department of Energy proposed testing requirements under the Energy Policy Act of 2005.
- As currently written, this draft specification is intended for commercial food-grade refrigeration equipment only. EPA is currently exploring energy efficiency levels for laboratory-grade refrigeration equipment. Once these levels are determined, they will be incorporated into this specification, resulting in a single document that addresses both food-grade and lab-grade equipment with separate energy efficiency criteria for each. Therefore, at this time, laboratory-grade refrigeration equipment cannot qualify for ENERGY STAR.
- Reference to ANSI/ASHRAE Standard 72-2005 in Section 4: Test Criteria. Based on manufacturer discussions, referencing Standard 72, as opposed to the previously

referenced and now outdated ASHRAE/ANSI 117 Standard, will not impact energy efficiency performance results.

Please note that while EPA would like to respond to stakeholder feedback and include additional product types within this specification, there is little or no data available from existing sources on the energy consumption of solid and glass door refrigerator-freezer units, drawer cabinet units, glass door freezers, and ice cream freezers (under the new -15 degree F testing conditions). In order for EPA to be able to address these product types, we ask that stakeholders review ANSI/ASHRAE Standard 72-2005 for these product types. To the extent it is feasible for your review to include product testing, we encourage you to submit your test results using the attached worksheet. We also ask that any testing include manufacturer's most current and popular models so that the resulting dataset is truly representative of the products available in the market. Depending on the data received, EPA will be able to draw appropriate specification lines and complete Table 1 of the Draft Eligibility Criteria.

EPA will host a webinar on **February 28, 2008**, from 1:00 to 3:00pm Eastern Standard Time, to present an overview of the specification revision process including a proposed timeline, provide details on the data analysis performed to date, and address stakeholder questions and concerns regarding the proposed changes. If you would like to participate in this online meeting, please RSVP by **February 21, 2008** to Bijit Kundu at (202) 862-1157 or [bkundu@icfi.com](mailto:bkundu@icfi.com).

The exchange of ideas and information among EPA, industry, and other interested parties is critical to the success of ENERGY STAR. Manufacturers are strongly encouraged to provide written feedback on Draft 1 of Version 2.0 specification and any supporting data to Bijit Kundu at [bkundu@icfi.com](mailto:bkundu@icfi.com) by **April 10, 2008**. EPA intends to aggregate all data received and use it only to support the commercial refrigeration specification revision process.

To track EPA's progress in revising the ENERGY STAR specification for commercial refrigerators and freezers, visit the Product Development Web site at [www.energystar.gov/productdevelopment](http://www.energystar.gov/productdevelopment) and click on "Revisions to Existing Specifications." All stakeholder comments on the Version 2.0 document will be posted to this Web site unless otherwise requested.

Thank you for taking the time to review this draft specification. I look forward to working with you over the next few months. Please feel free to contact me directly with any questions or concerns at (202) 343-9124 or via e-mail at [schmeltz.rachel@epa.gov](mailto:schmeltz.rachel@epa.gov).

Sincerely,



Rachel Schmeltz  
ENERGY STAR Product Development