

Comments on Draft 2
09/15/2008

- I disagree with the definition of "glass doors" - it should be "greater than 50% of the front surface", not the total surface
- Do you define the "gross volume" on p. 5 as the gross internal volume or the gross external volume?
- I am in favor of tough standards, but I must question the statement that the requirements are based on the best 25% of coolers currently in the field.
- Your Note on p.7 states that models that do not meet Federal minimum efficiency standards were removed from consideration. Since the Federal standards have not been published yet, do you know for sure that they will be the same as the 2007 CEC standards?
- I oppose testing coolers with all optional accessories in "ON" position. I believe this will actually discourage OEMs from installing energy-management devices. I understand you are concerned about accessories that might be disabled on-site, but what if accessory is hard-wired and cannot be disabled, such as, for example, photocell that turns off lights when it gets dark in the store or the heaters that kick-in based on the outside temperature? I think that Energy Saving devices should be operational as long as they meet the ASHRAE 72 and 117 definitions (including the interpretations.)
- The Energy Star program requirements for Beverage Vending Machines contain Low Power Mode options. For the sake of consistency, as well as energy saving, I believe this should be included in the Commercial Glass-door Refrigerators as well.
- For the same reasons as above, a provision should be made for rebuilt machines.