

**Comments on Draft 2
Perlick Corporation
08/27/2008**

Based on the equations for calculating maximum daily energy usage included in the draft 2 version I received 8/26/2008, a solid door refrigerator with a volume of 0 to 15 cu/ft is allowed more energy than a glass door refrigerator of the same volume. Even the best insulated glass, (triple pane, low E), will not insulate as well as a solid foamed door. We make identical models that may have a solid or glass doors and in all instances the glass door models consume more energy.

If the issue is a lack of data points for the glass door models in this group that skews the applicable equation, I would suggest potentially referencing a different volume group that has more data points. It appears that the 15 to 30 cu/ft group allows for more energy consumption for glass door units when compared to solid door models of equal volume. Maybe an approach would be to assume a proportional allowance from the 15 to 30 cu/ft group and apply that to the 0 to 15 cu/ft group.