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May 8, 2017

Ms. Kirsten Hesla
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Hesla:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to *Final Draft Version 3.0 ENERGY STAR® Automatic Commercial Ice Maker (ACIM) specification*, released by the Environmental Protection Agency (EPA) on April 25, 2017.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 46 US states, the District of Columbia, and seven Canadian provinces. In 2015, CEE members directed nearly $7 billion of the $8.7 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

CEE Supports EPA Proposed Approach to Continue to Identify Energy Savings in the Commercial Ice Machine Market

CEE believes that the performance criteria in the proposed final draft allows for continued identification of the highest performing models in the automatic commercial ice machine market on and after the upcoming increase of the US Department of Energy minimum standards on January 28, 2018. The revision has the potential to provide continued support to CEE members

with programs for this product category, of which in 2016, 53 CEE member organizations offered commercial ice machine programs.[1]

CEE Supports the EPA Decision to Serve as a Resource to Support Better Understanding of the Market Opportunity Afforded by Connected Functionality

As noted in the EPA response to previous comments on Draft 2, connected functionality has the potential to change the way end users interact with ACIMs, and there is likely a need for them to become familiar with the capabilities and potential performance tradeoffs. CEE shares the EPA expectation that connected ACIMs could benefit from resources aimed at educating stakeholders throughout the market delivery channel (including program administrators, distributors and contractors, equipment operators, and end users) about the opportunity afforded and how to effectively leverage these products as a grid resource without compromising core product amenity. While there are intricacies of connected products that are not limited to ACIMs, there may be unique capabilities worth exploring to help ensure a positive consumer experience. CEE lauds EPA's decision to serve as a technical and educational resource for connected ACIMs, which at this time are not widely established. We look forward to EPA development of materials in collaboration with partners to support connected technology in this product category.

CEE Recommends Multiple Pathways to Connect and Open Standards Translation within the Physical Premise of the Building

CEE supports the commercialization of ACIMs that enables load management and customer benefits without compromising critical amenity. CEE applauds the encouragement of open standards in the ENERGY STAR connected criteria. To the extent manufacturers commercialize such products, CEE members believe there are a number of reasons for ACIMs to enable more than one means to connect; however, a local connection should be one option. In the event that ENERGY STAR plans to provide recognition opportunities for these products, CEE recommends recognizing connected ACIM criteria that require multiple pathways to connect, with at least one that is direct and on-premise. It is the belief of CEE Committee members that doing so will help ensure that a majority of consumers realize benefits and that the grid benefit is increased nationally by scaling the number of consumers and demand response providers that can leverage the load management functionality of these products.

Diverse in-field conditions (regulatory, terrain, customer density, metering infrastructure) often require a variety of communication technologies to enhance the likelihood that devices for

[1] Based on data collected in the 2016 CEE Commercial Kitchens Program Summary.

demand response, energy efficiency, and other amenities are readily accessible. Specification of particularly acceptable pathways must recognize this diversity and provide consumers with sufficient options to make use of the added capabilities. A modular approach that is based on open standards is one option to address this diversity and provide consumers, utilities, manufacturers, and third parties with flexibility. For example, a modular communication interface such as a CTA-2045 port or some other means to ensure local access through open standards provides flexibility[2] to enable connectivity within the physical premises of the building and enhances the opportunity for a greater number of load management organizations to leverage demand response capable ACIMs.

Another consideration relates to data sharing. Many CEE members would value equipment that communicates data via open standards in order to gain access to performance data across equipment types and to demonstrate value and justify promotion or partnership. Expected benefits of communicating equipment include: enhanced confidence in load forecasting, enabled ability to support load balancing capabilities that offer value for distributed energy resources, dispatching enabled capability to mitigate transmission and distribution investment, and offsetting system peaks.

As DSM administrators deploy programs, there will be a need to collect and process more and more data from numerous manufacturers over time. Automated data sharing represented in standard formats and with standard data definitions is desirable for programs to achieve greater scale and lower evaluation costs. Open, local access would help ensure that the ACIMs do not become inaccessible if a given manufacturer or service provider exits or chooses to charge consumers a fee for maintaining a cloud connection, which could diminish program participation.

CEE would once again like to thank the EPA for the opportunity to comment on *Final Draft Version 3.0 ENERGY STAR® Automatic Commercial Ice Maker (ACIM) specification*. Please contact CEE Program Manager Laura Thomas at (617) 337-9272 with any questions about these comments.

Sincerely,

Ed Wisniewski
Executive Director, CEE

[2] A modular communication interface is intended to enable end use devices to work with any communication network through plug-in communication modules, to enable manufacturers to produce common models that could be distributed everywhere, and to minimize upfront cost. The communication module added to the port can communicate in a variety of ways (radio frequency, Wi-Fi, Bluetooth, etc.) and be changed out as technology or load management programs evolve.