Scotsman Ice Systems, LLC Comments on ACIM Energy Star 2.0 Draft 2

Page 2:

Scotsman Ice Systems supports the approach of separate requirements based on machine and ice type.

Page 4:

Scotsman Ice Systems supports the use of the term "Hardness" to describe the ice content of continuous ice makers. We believe it accurately reflects what the customer experiences and eliminates the potential for confusion with the word "quality".

We also support the posting of adjusted and non-adjusted energy use for continuous type ice makers. This will allow the consumers to compare the energy consumption based on what is most important to them.

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Scotsman Ice Systems supports the use of power curves as opposed to the previous linear approach. We note however that in the RCU Batch Type category, no machines over 2000 pounds meet the proposed levels. To meet the proposed levels, most machines would need to reduce energy use by roughly 25%. We believe the curve should be adjusted to allow some machines over 2000 pounds to meet the requirement. Particularly, there are several machines near the 2200 pound level. We suggest the curve move so some of these qualify.

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We support the proposed potable water consumption rates.

Page 7:

Scotsman Ice Systems supports the use of test standard AHRI 810-2007, however, this standard may be revised in the near future. Allowances should be made to test to the most current version of AHRI 810.

We strongly support the coordination between Energy Star and the DOE in test procedures.

Respectfully submitted,

Matt Allison
Vice President of Engineering
Scotsman Ice Systems
P: 847-215-4475
Matt.Allison@Scotsman-ice.com