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Comments to EPA on Energy Star® Program Requirements for Commercial Refrigerators and Freezers Specification Version 2.0 - Draft 3.

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To Rachel Schmeltz:

CEE appreciates the opportunity to provide comments on the ENERGY STAR specification for Commercial Refrigerators and Freezers (Version 2.0 - Draft 3). The Commercial Kitchens Committee (the Committee) recognizes the impact that ENERGY STAR has on enabling the purchase of more energy efficient commercial kitchens products. The Committee provides the following comments to ensure the ENERGY STAR label remains a credible, consistent indicator for energy efficient products.

During the development of Draft 3, ENERGY STAR conducted a comprehensive review of the entire data set, which resulted in modifications of the specification levels for all size sub-categories. These modifications resolved most of the concerns, expressed by many stakeholders during the Draft 2 comment period, regarding specification levels that are less stringent for solid door units than for glass door units. However, solid door units still have a less stringent efficiency requirement than for glass door freezers for the smallest size subcategory of solid and glass door freezers. With the exception of the door panel, our understanding is that glass door and solid door units are often exactly the same in terms of overall construction. It is generally accepted that glass doors have a poorer insulating value than solid doors; therefore, the Committee finds it counter-intuitive that solid door units should have less stringent ENERGY STAR requirements than their glass door counterparts.

CEE's initial research indicates that some of the units in this size subcategory have been improperly categorized (upright/chest) and that additional data points are available that would impact the specification levels. In addition, the current data set for solid door freezers under 15 cubic feet is extremely small (n=2). The Committee requests that ENERGY STAR review the data set for the smallest size solid and glass door freezers again to ensure that the units have been properly categorized and that all available data points are included in the data set. Should the data set for solid door freezers less than 15 cubic feet remain extremely small, the Committee requests that ENERGY STAR provide the basis for continuing with a specification for this subcategory.

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The Committee wishes to re-convey its concern about the accuracy and consistency of the current ENERGY STAR qualified products list. In the development of the Draft 2 specification, EPA stated that the current ENERGY STAR data set includes equipment tested with all accessories turned on as well as equipment tested with these same accessories disabled. CEE also recently identified significant inconsistencies when comparing the ENERGY STAR qualified products list to third-party certified data contained in the Natural Resources Canada product database.

CEE requests that EPA provide information on how ENERGY STAR plans to address these data quality issues both while the current ENERGY STAR qualified products list is effective and on an ongoing basis to better ensure data accuracy and consistency.

Once again, CEE would like to thank the EPA for the opportunity to comment on the ENERGY STAR specification for Commercial Refrigerators and Freezers (Version 2.0 - Draft 3). Please contact CEE Program Manager, Kim Erickson, at 617-589-3949, ext. 234 with any questions about these comments.

Sincerely,



Marc Hoffman
Executive Director