



February 16, 2022

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Via electronic mail: [cfs@energystar.gov](mailto:cfs@energystar.gov)

Subject: ENERGY STAR Final Draft Specification 5.0 for Commercial Refrigerators and Freezers

Dear Ms. Crk,

Continental Refrigerator has been an ENERGY STAR Partner and active stakeholder for many years, and was proud to be named a Partner of The Year for 2020. The program is very important to the Food Service industry and we value the incentives and programs that promote qualified equipment, which reduces energy consumption and operating costs. We respectfully submit the following comments in response to the Final Draft of Version 5.0 Product Specification for Commercial Refrigerators and Freezers.

We appreciate and support EPA's desire and efforts to expand the ENERGY STAR program to additional product families. The inclusion of new product categories should only be undertaken when industry-accepted test procedures, that have been adequately vetted and approved after stakeholder feedback, are in force. As EPA is aware, chef bases (aka griddle stands) are expressly exempt from DOE regulations, due to the special designs required for the intended use of these products in extreme ambient conditions. The addition of new ENERGY STAR product categories for chef bases at this time, without an accepted test procedure that reflects the intended application of the products, is premature.

In addition, the lack of a thorough, established data set, using an industry-accepted test procedure at proper conditions that reflect the intended use, results in the proposed standard levels being highly questionable. This also sets a concerning precedent for EPA to add future product families, without providing sufficient baseline test data to establish suitably representative energy standards.

EPA has referred to some limited energy testing that has been done on chef base models as justification for the proposed standard levels. An analysis by Southern California Edison (ET15SCE1010) from August 2016 evaluated Chef Bases for Foodservice Applications. This study tested energy consumption of six different units, using ASHRAE Standard 72-2014 test conditions. An additional heat load was not included, because they determined that when an electric griddle was placed on top of a chef base, there was reportedly insignificant variation in energy test results. We believe this conclusion may be based on insufficient data and thorough understanding of the application. Refrigerated chef bases are subject to extreme heat loads from high temperature cooking equipment adjacent to, as well on top of the unit. The study also found an extremely wide variation in energy consumption of the six units tested. We believe that additional vetting of studies used to establish ENERGY STAR levels should be completed, to ensure fairness and confidence in the program.

EPA should allow DOE, with input from interested parties, to develop and implement acceptable test procedures, and provide opportunity for testing sufficient quantities of representative products, before establishing new ENERGY STAR categories and standard levels.

In regards to the Effective Date of new Specifications, EPA noted that they anticipate completing Version 5.0 process no later than March 16, 2022 with an effective date of December 16, 2022. We urge EPA provide at least 18 months from publication of any new Specifications before products must comply with any reductions in allowable energy consumption, as is the case with the Version 5.0 Final Draft. Manufacturers must evaluate any required changes that may be needed to maintain product qualification, identify required design or component changes, source and acquire components, and implement changes into their production. Supply chains for components have been severely impacted by recent pandemic challenges, significantly impacting availability and extending lead time of components.

We appreciate the opportunity to comment on this final draft and EPA's consideration of our views.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Bauman', with a long horizontal flourish extending to the right.

Jeff Bauman  
Engineer