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Department of Energy

1000 Independence Avenue, SW

Washington DC, 20585-0121

Agency: Office of Energy Efficiency and Renewable Energy, Department of Energy

Subject: Comments on DOE verification testing in support of ENERGY STAR

On behalf of Hoshizaki America, Inc., thank you for the opportunity to comment on the April 22 document, "DOE Verification Testing in Support of ENERGY STAR". Based on review of the contents, Hoshizaki America encourages DOE/EPA administration to note the following:

- Commercial foodservice equipment (CFE) is produced and sold in relatively low volumes with the comparison to residential appliances. Grouping CFE with residential appliances is both technically inaccurate and economically impractical because the number of commercial models is significantly larger. For example, models may be custom-fabricated to suit specific customer needs and each may have a different SKU number. This illustrates that a "one-size-fits-all" approach to verification testing for commercial and residential goods will create inaccurate test results and unnecessary expenses.
- DOE's April 22 document and the ENERGY STAR Verification Testing for Certification Bodies Draft Guidance document (dated April 25), appear in conflict with regard to sample sizes and testing frequency. These conflicts are confusing and raise the specter of expensive duplication of effort. It should be spelled out in more detail how the sample size is determined.
- The verification program is redundant as manufacturers already work with Certification Bodies (CB's) to conduct factory audits for safety and ISO compliance. These audits are sufficient to ensure changes are not made to qualified products that will affect energy performance. Utilizing existing third-party audits that could include random audits for parts and testing could be used in lieu of mandatory testing for a percentage of products of all manufacturers. Any way to save the taxpayer money by reducing the test samples and testing used by DOE should be considered.
- **Page 3, Item 5.1** – By the DOE's definition we would have a basic model for each model we produce. It appears the process used by DOE to determine "basic models" from the ENERGY STAR database is problematic. There is often insufficient information available to determine which models are similar. For Commercial ice makers, no two models are essentially identical in energy and water consumption. AHRI pooled the manufacturers to help define basic model

criteria that would work in voluntary testing of our machines. The voluntary program by AHRI has worked for over 20 years in helping the manufacturers police our own products and randomly audit our performances yearly.

- **Page 4, Item 5.3** – Commercial food service equipment is typically available only through dealers or from the factory, not retail outlets.
- **Page 4, Item 6.3** – Barring manufacturers from assisting in the set up and test performance should be reconsidered. If manufacturers are allowed to perform tests for safety and sanitation under a CB's supervised manufacturer test lab program, why should they not be trusted to assist in the set-up and witnessing of verification testing? In fact, there may be subtleties of the test that could result in wasted time and effort if not resolved early with manufacturers' assistance. The DOE should welcome the assistance of experienced engineers in the setup of testing of units to insure that DOE is meeting the guidelines of the national testing standards.
- **Page 5, Item 6.4** – The DOE states that in some cases verification testing will be conducted with no tolerance. In no testing of multiple units can you achieve the same energy or water consumption figures. DOE should look to current standards being used in the field to determine tolerances to use for testing. These standards should be discussed in an open forum so DOE can understand the complexity created by energy consumption, water consumption, and other factors in commercial appliances.

When the ENERGY STAR program enhancements were originally presented in spring 2010, it was stated that EPA would provide program management services while DOE would provide enforcement. Based on the contents of these documents, it appears both entities will serve similar, overlapping roles. The strong potential for duplication of effort illustrates a need for close coordination between the two agencies and industry stakeholders. Hoshizaki America respectfully requests a meeting between DOE, EPA and industry stakeholders as soon as possible to illustrate concerns, resolve inconsistencies and develop verification program policies that are credible and practical for all.

Hoshizaki America respects the ENERGY STAR program and the benefits it has for the public at large. We remain committed to the program and are eager to continue working in partnership with you to ensure its long-term viability and success.

Sincerely yours,

Stephen Schaefer