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Frontier Energy Comments for RFI on Commercial Food Service Equipment

Additional submitted attachment is included below.



February 13, 2024

Attn: Alejandro Galdamez, P.E.
California Energy Commission
Docket No. 23-AAER-01
715 P Street
Sacramento, CA 95814
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Re: Request for Information (RFI) and Invitation to Submit Proposals (ITSP); Appliance Efficiency Regulations for Commercial Food Service Equipment; Docket 23-AAER-01

Dear Mr. Galdamez:

The Frontier Energy Food Service Technology Center, representing PG&E Codes and Standards, submits the following comments on the California Energy Commission's (CEC) Request for Information and Invitation to Submit Proposals, Appliance Efficiency Regulations for Commercial Food Service Equipment, Docket 23-AAER-01 (RFI) for consideration.

1. CEC Should Adopt ASTM Methodology and Leverage Existing Data to Form a Comprehensive Database for Evaluation.

Official American Society for Testing and Materials (ASTM) test methods for the categories in question have been established for many years and widely adopted throughout the industry. These test methods were created collectively through the input of manufacturers and industry experts, and refined throughout years of use as market technologies evolved. Thus, Frontier Energy has data repositories that reflect not only the current state of the market, but decades of prior equipment models that can provide historical context on baseline efficiencies and potential for energy improvement. Not leveraging this existing data and methodology would be cost and labor intensive. Attempts to generate new methodology may also be vulnerable to repeating mistakes that had already previously been addressed and fixed during previous ASTM iterations.

2. CEC Should Carefully Define Covered Products, Sub-Categories and Exceptions to Ensure All Facility Use Cases Are Met.

A critical potential issue for establishing standards lies in the definition of each covered product category and corresponding subcategories. Adopting energy standards that are currently used broadly for prescriptive measures could cause significant issues if mandated across a product category, completely excluding certain technologies or

subcategories without proper alternatives. One specific example would be energy criteria for steam cookers – many efficiency programs currently have energy levels set that would exclude boiler-based steam cookers. This technology is necessary for facilities that require very high production however, without any suitable replacement that can meet the low energy requirements applied broadly across the entire steam cooker category. A similar parallel exists for donut fryers, which necessitate a large surface area to accommodate the cooking process but would never pass the energy criteria for a typical vat fryer used to cook French fries. To ensure these facility use cases are accounted for, sub-categories with specific energy criteria are necessary to identify and define. Great care will be needed to ensure there are no equipment sub-categories being overlooked, and it is highly recommended that the CEC establish working groups and hold public meetings to oversee the process.

3. **CEC Should Develop Standards With Awareness of Existing Rebate Programs and Potential Program Impacts.**

Rebate programs currently exist across the country that make energy efficient equipment cost-effective to pursue. California's Instant Rebate Program has demonstrated the ability to move the market towards energy efficiency not just for consumers, but for manufacturers who want to develop efficient products to take advantage of available incentives. The development of CEC standards should account for the existence of such programs, including the potential for wiping them out and making energy efficient products a greater cost burden for businesses. Energy standards that are implemented without full consideration for the marketplace may result in steps backward, incentivizing businesses to keep older, inefficient equipment for longer. Businesses may also prioritize cheap used equipment if efficient equipment is not cost effective. Rebate incentive levels should be carefully reviewed and open dialogue with program administrators would help to maintain a product marketplace conducive to adopting efficient equipment.

Frontier Energy looks forward to sharing our expertise through continued discussion with the CEC. Please feel free to reach out for any clarifications or follow-up questions.

Best Regards,

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