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EARTHJUSTICE

via electronic submission August 16, 2024

California Energy Commission
Docket Unit
Docket No. 23-AAER-01
715 P Street
Sacramento, CA 95814

RE: Earthjustice Comments on Efficiency Standards for Commercial Steam Cookers, Docket 23-AAER-01

Energy Commission:

Earthjustice submits the following comments on Title 20 efficiency standards for commercial steam cookers and requests the California Energy Commission ("CEC") move forward with an efficiency standard for gas steam cookers that is more stringent than that proposed by the Codes and Standards Enhancement ("CASE") Team. The CASE Team recommends the CEC adopt ENERGY STAR V1.2 specifications established over two decades ago that require 38 percent minimum efficiency for gas steamers and 50 percent minimum efficiency for electric steamers.[1] Since that time, numerous steam cooker models are now available with efficiency levels substantially above minimum ENERGY STAR standards. In addition, the urgency of ending combustion of fossil fuels has become much more acute, with California recognizing that achieving its climate objectives "must include transitioning away from fossil gas in residential and commercial buildings, and will rely primarily on advancing energy efficiency while replacing gas appliances with non-combustion alternatives."[2] Indeed, as the CEC has acknowledged, "gas equipment efficiency investments have a growing likelihood over time of becoming stranded assets, becoming a liability for carbon offsets, or causing the

[1] Cal. Investor Owned Utilities, Commercial Steam Cookers, CASE Initiative for PY 2024: Title 20 Standards Development, Docket 23-AAER-01, at 7 ("Title 20 Commercial Steam Cookers Report") (May 21, 2024), https://efiling.energy.ca.gov/GetDocument.aspx?tn=256497&DocumentContentId=92316. For Energy Star V1.2 specifications, see Energy Star, *Energy Star Program Requirements Product Specification for Commercial Steam Cookers: Eligibility Criteria Version 1.2*, at pdf p. 3–4, https://www.energystar.gov/sites/default/files/specs/private/Commercial_Steam_Cookers_Program_Requirements%20v1_2.pdf.

[2] CARB, *2022 Scoping Plan for Achieving Carbon Neutrality*, at 212 (Dec. 2022), https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.

state to miss its goals."[3] Accordingly, Title 20 standards for commercial cooking equipment should be as stringent as feasible while also designed to move the market toward electric options.

To align with California's goal of transitioning from combustion appliances and better capture efficiency advances in commercial steamers, the CEC should increase the proposed 38 percent minimum efficiency standard for gas steamers to at least 47 percent. For electric steam cookers, Earthjustice recommends adopting the ENERGY STAR V1.2 efficiency standard. These changes will further move the market for commercial steamers to electric options by properly focusing energy efficiency incentives on electric models and any electrical upgrades that may be necessary for their deployment while still allowing for use of gas steamers where necessary. In evaluating the cost-effectiveness of the proposed standards, the CEC should account for increases in gas rates that will result from decreased gas throughput as California increasingly deploys zero-emission alternatives to gas end-uses.

There are Numerous Gas Steam Cookers on the Market at Efficiency Levels that Exceed Energy Star V1.2.

The ENERGY STAR Steam Cooker V1.2 specification went into effect in 2003 and over the past two decades, steam cooker technology has significantly progressed. Technological improvements to commercial steamers include better insulation and heat retention, more exact controller design, systematized water drainage methods, and the creation of setback idle modes.[4] In the 21 years since the ENERGY STAR Steam Cooker Program began, compliant steam cooker models have become widely available. Currently, 53 percent of commercial steam cooker models on the market are compliant with the V1.2 specifications.[5] While ENERGY STAR only requires gas steamers to meet a 38 percent efficiency level, the average energy efficiency for a gas steam cooker model that is eligible for the California Foodservice Instant Rebate is 46 percent.[6] Earthjustice recommends the CEC adopt a minimum efficiency standard of 47 percent for gas steam cookers. As identified in the Table below, there is at least one model in each pan capacity category that meets this efficiency standard. From Earthjustice's review of available pricing information, models with at least 47 percent efficiency did not have significantly different costs from models meeting minimum ENERGY STAR standards, and in some cases were less costly.

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[3] CEC, *2021 Integrated Energy Policy Report Vol. 1*, at 22 (Feb. 2022), https://efiling.energy.ca.gov/GetDocument.aspx?tn=241599.

[4] *See* DOE, *Purchasing Energy-Efficient Commercial Steam Cookers*, https://www.energy.gov/femp/purchasing-energy-efficient-commercial-steam-cookers (last visited Aug. 15, 2024).

[5] ASAP, *Appliance Efficiency Standards Focus on: Food Service Equipment*, at 2, https://appliance-standards.org/sites/default/files/Food_Service_Equipment_fact_sheet_2.pdf (last visited Aug. 15, 2024).

[6] Cal. Energy Wise, *California Foodservice Instant Rebates*, https://caenergywise.com/instant-rebates/qpl/ (last visited Aug. 15, 2024). Average efficiency was calculated by taking the average of the cooking efficiencies from the steamer models provided in the in-browser Qualifying Product list.

Table 1. Gas Steam Cooker Models with a Cooking Efficiency ≥ 47%.[7]

Brand Name	Model Name	Model Number	Model Type	# Pans	Cooking Efficiency (%)	Water Use (gph)	Idle Rate (Btu/hr)	Market Price (USD)
Market Forge	Sirius II-4	Sirius II-4	Boilerless	4	49	1	5850	12,500 [8]
Groen	XSG-5	XSG-5	Boilerless	5	49	3	7027	11,023 [9]
Market Forge	Sirius II-6	Sirius II-6	Boilerless	6	47	1	5592	16,000 [10]
Sterling	SPG-6	SPG-6	Boilerless	6	53	1.75	12350	12,221 [11]
Market Forge	Sirius II-8	Sirius II-8	Boilerless	8	49	2	11700	28,325 [12]
Market Forge	Sirius II-10	Sirius II-10	Boilerless	10	48	2	11442	29,355 [13]

[7] EPA, *ENERGY STAR Certified Commercial Steam Cookers*, https://catalog.data.gov/dataset/energy-star-certified-commercial-steam-cookers (last updated Aug. 9, 2024). For consumers seeking steam generator models, there are electric alternatives with various pan capacities listed in Annex A.

[8] KaTom Restaurant Supply, *Market Forge SiriusII-4*, https://www.katom.com/301-SIRIUSII4.html?utm_source=google&utm_medium=cpc&utm_campaign=%5BROI%5D%20Shopping%20-%20PMax%20-%20Extended%20Lead%20Time&utm_id=17818340533&utm_content=&utm_term=&gad_source=4&gclid=Cj0KCQjw5ea1BhC6ARIsAEOG5px_MRDD8eOk-6CKgnrMsdumAQoOOBA4JCqVlCeW3ZSFyKJBJQaSav4aAiD4EALw_wcB.
A comparable gas model, the Cleveland Range 22CGT3.1 - 3 Pan, with a 39% cooking efficiency costs $13,264 from KaTom Restaurant Supply, https://www.katom.com/109-22CGT31.html.

[9] ACityDiscount Restaurant Equipment and Supply, *Groen XSG-5 Gas Convection Steamer*, https://www.acitydiscount.com/Groen-Intek-Gas-Convection-Steamer-w-5-Pan-Cap-Resevoir-XSG-5.0.139000.1.1.html (last visited Aug. 15, 2024).

[10] KaTom Restaurant Supply, *Market Forge SiriusII-6*, https://www.katom.com/301-SIRIUSII6NG.html (last visited Aug. 15, 2024). Comparable 6-pan gas models, the AccuTemp Evolution Series and Cleveland Range Gemini and Steam Chef 6 models, with cooking efficiencies of 39–43% cost on average $16,834, Cooking efficiencies are sourced from: https://caenergywise.com/instant-rebates/qpl/ and prices are sourced from: https://www.katom.com/087-P61201E060.html; https://www.webstaurantstore.com/accutemp-n61201e060-evolution-6-pan-countertop-natural-gas-boilerless-steamer-60-000-btu/989N61201E06.html; https://www.katom.com/087-N61201D060.html; https://www.katom.com/109-24CGA62SNG.html; https://www.katom.com/109-22CGT61NG.html; https://www.katom.com/109-24CGA62SNG.html; https://www.katom.com/087-P61201D060.html.

[11] Culinary Depot, *Sterling Manufacturing SPG-6*, https://www.culinarydepotinc.com/sterling-manufacturing-spg-6-mf-lp-sbu-26-5-w-stainless-steel-liquid-propane-boilerless-convection-steamer-60-000-btu/?srsltid=AfmBOoqG9MVHK2N6johVcfP6BjJrGlnJtIlE6cX56ZI6S72JqwbcUYoXUVM (last visited Aug. 15, 2024). Comparable 6-pan gas models, the AccuTemp Evolution Series and Cleveland Range Gemini and Steam Chef 6 models, cost on average $16,834, https://www.katom.com/087-P61201D060.html; https://www.katom.com/109-22CGT61NG.html; https://www.katom.com/109-24CGA62SNG.html.

[12] KaTom Restaurant Supply, *Market Forge SiriusII-8*, https://www.katom.com/301-SIRIUSII8NG.html (last visited Aug. 15, 2024).

[13] KaTom Restaurant Supply, *Market Forge SiriusII-10*, https://www.katom.com/301-SIRIUSII10LP.html (last visited Aug. 15, 2024).

Market Forge	Sirius II-12	Sirius II-12	Boilerless	12	47	2	11184	30,385 [14]

Increasing Gas Steamer Efficiency to 47 Percent Better Aligns California's Efficiency Programs with its Electrification, Public Health and Climate Objectives.

Increasing minimum gas steamer efficiency to 47 percent and adopting the minimum 50 percent efficiency in ENERGY STAR V1.2 for electric steamers puts efficiency standards for both equipment types at relative parity and will encourage increased deployment of electric models by focusing incentive funding on electric models. Electric steam cookers are already more popular than their gas counterparts. In California, 67.3 percent of steam cookers are electric (32,960 total units) and 32.6 percent are gas steam cookers (15,957 total units).[15] In addition, the equipment costs for electric steam cookers are generally cheaper or comparable to gas alternatives. For boilerless steam cookers, a baseline electric model costs $12,900, while a baseline gas model costs $16,297.[16] For steam generator models, an electric baseline model costs $29,376 and a gas baseline model costs $28,391.[17] Yet despite the air quality, public health, and climate impacts of combustion appliances, the California Foodservice Instant Rebates Program currently offers a higher rebate for gas steam cookers ($2000 rebate per unit) compared to electric steam cookers ($1500 per unit).[18] Aligning incentives away from gas models and toward electric options will help to further increase use of electric steamers in commercial kitchens.

Setting the gas steamer efficiency standard at 47 percent corrects for the misalignment in efficiency funding with California's climate objectives and properly focuses incentives on deployment of electric steamers. Because most gas models currently eligible for efficiency incentives would not exceed minimum requirements under a 47 percent efficiency standard, they would no longer be eligible for efficiency incentives. In contrast, were the CEC to set gas steam cooker efficiency standards at only 38 percent, these models would continue to be beneficiaries of efficiency funding since their average efficiency level is 46 percent. As identified below in Annex A, for electric steam cookers, there are 147 models—140 of which are boilerless and 7 of which are steam generators—compliant with the ENERGY STAR V1.2 specifications. In addition to leaving numerous model options available to commercial kitchens, as the average

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Comparable 10-pan gas models, Market Forge ETP-10G and Cleveland Range Gemini, with cooking efficiencies of 40-45% cost on average $29,355, https://www.katom.com/301-ETP10GLP.html; https://www.katom.com/109-24CGA102NG.html.

[14] KaTom Restaurant Supply, *Market Forge SiriusII-12*, https://www.katom.com/301-SIRIUSII12LP.html (last visited Aug. 15, 2024).

[15] Title 20 Commercial Steam Cookers Report at 46.

[16] *Id.* at 59.

[17] *Id.*

[18] Cal. Energy Wise, *California Foodservice Instant Rebates*, https://caenergywise.com/instant-rebates/ (last visited Aug. 15, 2024).

efficiency for an approved electric steam cooker model in the California Foodservice Instant Rebate Program is 67 percent, a baseline 50 percent efficiency standard would allow for continued incentives to purchase electric steamers, increasing their value proposition as compared to gas alternatives.[19] To the extent electric infrastructure upgrades are needed for efficient electric steamer deployment, funds could be allocated from the market support segment of the California Public Utilities Commission's ("CPUC") energy efficiency program.[20]

The Cost-Effectiveness Analysis Should Be Updated to Account for Increased Gas Rates from Declining Gas Throughput.

In assessing cost-effectiveness of the proposed standards, the CEC should account for the impact of California's transition away from fossil fuels on gas rates.[21] In the *Commercial Steam Cookers* Report, the CASE team relied on the CPUC's *Utility Costs and Affordability of the Grid of the Future Report* to forecast gas rates, which assumes annual growth of 6.5 percent per year based on *historic* averages.[22] This backward look at gas rates understates future gas rate increases because it fails to account for the impact of declining gas demand on gas rates as system costs are spread across diminishing gas sales. To more accurately project future gas rates, the 6.5 percent annual growth rate should account for the gas demand declines forecast in the CEC's recently adopted Gradual Transformation forecast.[23] This forecast was specifically adopted for use in gas system planning to "strik[e] the right balance" between "overinvestment in the gas system and the risk of stranded assets as electrification expands" and "maintain[] the reliability and adaptability of the gas system" and should now be used for gas rate forecasting.[24]

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[19] To the extent the CEC is inclined to increase efficiency of electric steam cookers above ENERGY STAR standards, it could adopt a 67 percent minimum efficiency standard.

[20] In D.21-05-031, the CPUC established three different portfolio segments for energy efficiency portfolios: resource acquisition, market support, and equity. D.21-05-031, *Assessment of Energy Efficiency Potential and Goals and Modification of Portfolio Approval and Oversight Process*, at 14–15 (May 26, 2021), https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M385/K864/385864616.PDF. The resource acquisition segment would be used to achieve savings through increased efficiency while the market support segment could be used to enable that savings by supporting necessary electric upgrades.

[21] Earthjustice, Initial Comments on Commercial Cooking Appliance Standards Rulemaking, Docket 23-AAER-01, at 4 (May 20, 2024), https://efiling.energy.ca.gov/GetDocument.aspx?tn=256473.

[22] Title 20 Commercial Steam Cookers Report at 43; CPUC, *Utility Costs and Affordability of the Grid of the Future*, at 73 (May 2021), https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2021/senate-bill-695-report-2021-and-en-banc-whitepaper_final_04302021.pdf.

[23] CEC, *May 8, 2024 Business Meeting Item 10: 2023 Gradual Transformation Additional Achievable Fuel Substitution (AAFS) Scenario*, at Slide 5 (May 8, 2024), https://www.energy.ca.gov/filebrowser/download/6333?fid=6333#block-symsoft-page-title.

[24] CEC, *2023 Integrated Policy Report*, at 142 (Feb. 2024), https://efiling.energy.ca.gov/GetDocument.aspx?tn=254463.

Thank you for your consideration of these comments. Earthjustice looks forward to continued engagement with the CEC throughout its rulemaking process.

Sincerely,

Matt Vespa
Senior Attorney
Earthjustice
mvespa@earthjustice.org

Cassidy Childs
Senior Research and Policy Analyst
Earthjustice
cchilds@earthjustice.org

ANNEX A.

Table 3. Electric Steam Cooker Models that meet ENERGY STAR V1.2 Specifications. [25]

Brand Name	Model Name	Model Number	Model Type	Pan Capacity	Cooking Efficiency (%)	Water Consumption (gph)	Idle Rate (Watts)
Superior	C24EO3	C24EO3	Boilerless	3	74	0.6	259
Groen	VRC-3E	VRC-3E	Boilerless	3	70	2	251
Hobart	HC24EO3AF	HC24EO3AF	Boilerless	3	60	1.6	230
Vulcan	C24EO3AF	C24EO3AF	Boilerless	3	60	1.6	230
Crown Food Service	EPX-3	EPX-3	Boilerless	3	63	3	130
Crown Food Service	EPXN-3	EPXN-3	Boilerless	3	75	3	130
AccuTemp	E32083E15000200	E32083E15000200	Boilerless	3	53	1.5	235
AccuTemp	E32081D060	E32081D060	Boilerless	3	53	1.5	235
AccuTemp	E32083E150	E32083E150	Boilerless	3	53	1.5	235
AccuTemp	E32083E080	E32083E080	Boilerless	3	53	1.5	235
AccuTemp	E32301D070	E32301D070	Boilerless	3	53	1.5	235
AccuTemp	E34403E120	E34403E120	Boilerless	3	53	1.5	235
AccuTemp	E32401E060	E32401E060	Boilerless	3	53	1.5	235
AccuTemp	E32403D110	E32403D110	Boilerless	3	53	1.5	235
AccuTemp	E34803D140	E34803D140	Boilerless	3	53	1.5	235
AccuTemp	E32301E070	E32301E070	Boilerless	3	53	1.5	235
AccuTemp	E32401D060	E32401D060	Boilerless	3	53	1.5	235
AccuTemp	E34403D120	E34403D120	Boilerless	3	53	1.5	235

[25] EPA, ENERGY STAR Certified Commercial Steam Cookers (July 20, 2024), https://catalog.data.gov/dataset/energy-star-certified-commercial-steam-cookers.

AccuTemp	E32081E060	E32081E060	Boilerless	3	53	1.5	235
AccuTemp	E32083D080	E32083D080	Boilerless	3	53	1.5	235
AccuTemp	E32083D150	E32083D150	Boilerless	3	53	1.5	235
AccuTemp	E32403E110	E32403E110	Boilerless	3	53	1.5	235
AccuTemp	E34803E140	E34803E140	Boilerless	3	53	1.5	235
Southbend	Southbend	EZ18-3	Boilerless	3	75	3	130
Southbend	Southbend	EZ24-3	Boilerless	3	63	3	130
Cleveland Range LLC	SteamChef 3	22CET3.1	Boilerless	3	67	4.4	310
Vulcan	C24EO3	C24EO3	Boilerless	3	74	0.6	259
Hobart	HC24EO3	HC24EO3	Boilerless	3	74	0.6	259
AccuTemp	Steam 'N' Hold	S32081D060	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32081E060	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32083D100	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32083D120	Boilerless	3	60	1.5	200
AccuTemp	Steam 'N' Hold	S32083E100	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32083E120	Boilerless	3	60	1.5	200
AccuTemp	Steam 'N' Hold	S32401D060	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32401E060	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32403D110	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32403D130	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32403E110	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S32403E130	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S34403D090	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S34403E090	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S34803D110	Boilerless	3	55	1.5	300
AccuTemp	Steam 'N' Hold	S34803E110	Boilerless	3	55	1.5	300

Market Forge	Turbo Steam	TS-3E	Boilerless	3	63	3	130
Vulcan	C24EA3-LWE	C24EA3-LWE	Steam Generation	3	55	2.09	288.59
Hobart	HC24EA3-LWE	HC24EA3-LWE	Steam Generation	3	55	2.09	288.59
Unified Brands	GSSP-CL-3E	GSSP-CL-3E	Boilerless	3	57	0.7	195
Market Forge	Altair II-4	Altair II-4	Boilerless	4	70	0.3	0.33
Southbend	Southbend	Altair II-4-SB	Boilerless	4	70	0.3	0.33
Crown Food Service	CSE-4	CSE-4	Boilerless	4	51	0.92	324.3
Southbend	CSE-4-SB	CSE-4-SB	Boilerless	4	51	0.92	324.3
Superior	C24EO5	C24EO5	Boilerless	5	77	0.7	382
Hobart	HC24EO5AF	HC24EO5AF	Boilerless	5	69	1.2	310
Vulcan	C24EO5AF	C24EO5AF	Boilerless	5	69	1.2	310
Crown Food Service	EPX-5	EPX-5	Boilerless	5	68	3	220
Crown Food Service	EPXN-5	EPXN-5	Boilerless	5	75	3	230
Southbend	Southbend	EZ18-5	Boilerless	5	75	3	230
Vulcan	C24EO5	C24EO5	Boilerless	5	77	0.7	382
Hobart	HC24EO5	HC24EO5	Boilerless	5	77	0.7	382
Cleveland Range LLC	1-SCE	1-SCE	Boilerless	5	71	3.49	567
Cleveland Range LLC	1-SCEMCS	1-SCEMCS	Boilerless	5	71	3.49	567
Market Forge	Turbo Steam	TS-5E	Boilerless	5	68	3	220
Vulcan	C24EA5-LWE	C24EA5-LWE	Steam Generation	5	61	4.29	293.39
Hobart	HC24EA5-LWE	HC24EA5-LWE	Steam Generation	5	61	4.29	293.39
Southbend	Southbend	EZ24-5	Boilerless	5	68	3	220
Unified Brands	GSSP-CL-5E	GSSP-CL-5E	Boilerless	5	60	0.8	292

Groen	VRC-6E	VRC-6E	Boilerless	6	76	4.5	300
Groen	XS-208-12-3	XS-208-12-3	Boilerless	6	64	3	200
Groen	XS-208-14-3	XS-208-14-3	Boilerless	6	64	3	200
Groen	XS-208-8-1	XS-208-8-1	Boilerless	6	64	3	200
Groen	XS-208-8-3	XS-208-8-3	Boilerless	6	64	3	200
Groen	XS-240-12-3	XS-240-12-3	Boilerless	6	64	3	200
Groen	XS-240-14-3	XS-240-14-3	Boilerless	6	64	3	200
Groen	XS-240-8-1	XS-240-8-1	Boilerless	6	64	3	200
Groen	XS-240-8-3	XS-240-8-3	Boilerless	6	64	3	200
Groen	XS-208-6-1	XS-208-6-1	Boilerless	6	64	3	200
Groen	XS-240-6-1	XS-240-6-1	Boilerless	6	64	3	200
Sterling	STERLING MANUFACTURING LLC	SP208-14-3MF00	Boilerless	6	79	0.92	330
Vulcan	C24ET6-LWE	C24ET6-LWE	Steam Generation	6	59	4.71	300
Market Forge	Altair II-6	Altair II-6	Boilerless	6	60	0.5	0.4
Cleveland Range LLC	22CCT6	22CCT6	Steam Generation	6	70	3.6	670
Southbend	Southbend	Altair II-6-SB	Boilerless	6	60	0.5	0.4
Southbend	Southbend	EZ18-6	Boilerless	6	75	3	230
Southbend	Southbend	EZ24-6	Boilerless	6	68	3	220
AccuTemp	Evolution	E62081D060	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62081E060	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62083D100	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62083D150	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62083D170	Boilerless	6	66	1.5	190

AccuTemp	Evolution	E62083E100	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62083E150	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62083E170	Boilerless	6	66	1.5	190
AccuTemp	Evolution	E62301D070	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62401D060	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62401E060	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62403D110	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62403D130	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62403E110	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E62403E130	Boilerless	6	61	1.5	300

AccuTemp	Evolution	E63805D090	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E63805E090	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E64005D100	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E64005E100	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E64155D110	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E64155E110	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E64403D120	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E64403E120	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E64803D140	Boilerless	6	61	1.5	300
AccuTemp	Evolution	E64803E140	Boilerless	6	61	1.5	300
Cleveland Range LLC	SteamChef 6	22CET6.1	Boilerless	6	64	10	390
AccuTemp	Steam 'N' Hold	S62081D060	Boilerless	6	69	1.5	300
AccuTemp	Steam 'N' Hold	S62081E060	Boilerless	6	69	1.5	300

AccuTemp	Steam 'N' Hold	S62083D080	Boilerless	6	67	1.5	420
AccuTemp	Steam 'N' Hold	S62083D100	Boilerless	6	71	1.5	330
AccuTemp	Steam 'N' Hold	S62083D120	Boilerless	6	68	1.5	420
AccuTemp	Steam 'N' Hold	S62083D150	Boilerless	6	62	1.5	500
AccuTemp	Steam 'N' Hold	S62083D170	Boilerless	6	70	1.5	160
AccuTemp	Steam 'N' Hold	S62083E080	Boilerless	6	67	1.5	420
AccuTemp	Steam 'N' Hold	S62083E100	Boilerless	6	71	1.5	330
AccuTemp	Steam 'N' Hold	S62083E120	Boilerless	6	68	1.5	420
AccuTemp	Steam 'N' Hold	S62083E150	Boilerless	6	62	1.5	500
AccuTemp	Steam 'N' Hold	S62083E170	Boilerless	6	70	1.5	160
AccuTemp	Steam 'N' Hold	S62301E070	Boilerless	6	62	1.5	500
AccuTemp	Steam 'N' Hold	S62401D060	Boilerless	6	69	1.5	300
AccuTemp	Steam 'N' Hold	S62401E060	Boilerless	6	69	1.5	300
AccuTemp	Steam 'N' Hold	S62403D110	Boilerless	6	62	1.5	500
AccuTemp	Steam 'N' Hold	S62403D130	Boilerless	6	62	1.5	500
AccuTemp	Steam 'N' Hold	S62403E110	Boilerless	6	62	1.5	500
AccuTemp	Steam 'N' Hold	S62403E130	Boilerless	6	62	1.5	500
AccuTemp	Steam 'N' Hold	S64403D120	Boilerless	6	68	1.5	420
AccuTemp	Steam 'N' Hold	S64403E120	Boilerless	6	68	1.5	420
AccuTemp	Steam 'N' Hold	S64803D140	Boilerless	6	62	1.5	500
AccuTemp	Steam 'N' Hold	S64803E140	Boilerless	6	62	1.5	500
Vulcan	C24ET6-LWE	C24ET6-LWE	Boilerless	6	59	0	300
Vulcan	HC24ET6-LWE	HC24ET6-LWE	Boilerless	6	59	0	300
Market Forge	Altair II-8	Altair II-8	Boilerless	8	70	0.3	0.33
Southbend	Southbend	Altair II-8-SB	Boilerless	8	70	0.3	0.33

Vulcan	C24ET10-LWE	C24ET10-LWE	Steam Generation	10	67	7.58	312
Market Forge	Market Forge	Altair II-10	Boilerless	10	70	0.3	0.33
Southbend	Southbend	Altair II-10-SB	Boilerless	10	70	0.3	0.33
Southbend	Southbend	ETP-10E-SB	Steam Generation	10	67	5.9	430
Market Forge	Eco-Tech Plus	ETP-10E	Steam Generation	10	67	5.9	430
Vulcan	C24ET10-LWE	C24ET10-LWE	Boilerless	10	67	0	312
Vulcan	HC24ET10-LWE	HC24ET10-LWE	Boilerless	10	67	0	312
Market Forge	Altair II-12	Altair II-12	Boilerless	12	62	0.47	0.4
Southbend	Southbend	Altair II-12-SB	Boilerless	12	62	0.47	0.4