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## **Unox comments on commercial ovens RFI**

In response to the Request for Information and Invitation to Submit Proposals regarding efficiency standards for commercial ovens, we would like to share the following comments:

### **Scope:**

The current scope is appropriate. However, it may be beneficial to include speed ovens in the future, once an energy efficiency test procedure has been developed for these products.

### **Product Categories:**

The categories that could benefit from a test and list requirement are those already included in the current scope.

### **Alignment with ENERGY STAR Standards:**

We strongly recommend the CEC to align with ENERGY STAR standards, specifically version 3.0. Aligning with ENERGY STAR would uphold a globally recognized standard and simplify the participation process for manufacturers. Many producers have already invested substantial resources into certifying their ovens under ENERGY STAR.

Requiring a separate California-specific certification would impose unnecessary additional costs, potentially discouraging participation and complicating compliance. By adopting ENERGY STAR standards, the CEC can streamline the process, enabling manufacturers to leverage their existing certifications without duplicative testing, fostering broader industry engagement.

Additionally, using version 3.0 would be important for ovens that utilize water, such as combination ovens and steam cookers, as it sets limits on overall water consumption, something not addressed in version 2.2. This ensures both energy efficiency and resource conservation, aligning with California goals for sustainable water usage.

### **Rebate Programs:**

To our knowledge, there are no rebate programs specific to this category of products, other than those offered by the investor-owned utilities (IOUs) in California.

### **Impact of Rebate Programs:**

We do not have specific information regarding the commercial impact of these rebate programs at this time.

### **Future Impact of Energy Efficiency Standards:**

While we cannot predict exactly how the introduction of energy efficiency standards for commercial ovens will affect access to rebate programs, we can anticipate that making these standards a prerequisite for rebates will likely encourage more manufacturers to

adopt them. This requirement would promote the widespread adoption of energy-efficient practices across the industry, ultimately enhancing the overall energy efficiency of commercial ovens. This, in turn, would improve the overall energy efficiency of the entire sector, as manufacturers strive to qualify for rebates.

We are available for any further clarifications or information.