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Revent Incorporated comments

Additional submitted attachment is included below.

In Bread We Trust

October 18, 2024
California Energy Commission
Docket Unit
715 P Street
Sacramento, CA 95814

Reference: Docket No. 23-AAER-01 – Commercial Food Service Equipment Request for Information

Subject: Revent Comments

Dear CEC Representative,

Revent respectfully submit our comments and recommendations with regards to the "(RFI) and Invitation to Submit Proposals (ITSP) Appliance Efficiency Regulations for Commercial Ovens".

Ever since Revent invented the world's first rack oven in 1958 we have consistently and purposefully worked for sustainable concepts. Revent is still the world's leading manufacturer of Rack ovens used by commercial bakeries, with sales in more than 45 countries and manufacturing both in Europe and the US.

Revent played an active role in the establishment of the ASTM standard for measuring Energy efficiency of rack ovens. Since those first tests back in 2005/2006 we have continued to support the adaptation of standards for independent energy efficiency testing and the journey to improve the sustainability of the baking industry.

1. Are there other types of commercial ovens, beyond the scope of the ENERGY STAR specification, that the CEC should consider for efficiency standards? Please elaborate

Looking at the products we sell to the US market there are primarily three types of ovens that are listed among the "Excluded products" in the ENERGY STAR 3.0 for Commercial ovens that should be considered:

- Electrically heated rack ovens
- Mini rack ovens
- "Quadruple rack ovens also known as "double-double rack ovens"

All of the oven types mentioned above are frequently used in bakeries and foodservice operations.

An important part of overall energy efficiency is that the operators choose the right size oven for the batches and total volumes they bake. Even an energy efficient oven will provide a poor energy efficiency per unit baked if it is not used at or near capacity in each baking cycle.

By having energy efficiency standards and standardized data on energy efficiency for more commercial oven sizes it will be easier to explain to end users and even help them calculate what the energy usage will be with different types of ovens to bake their products in the quantities they typically produce.

2. Are there any types of commercial ovens that the CEC should consider for test-and-list requirements? Please elaborate.

Based on the product categories that Revent manufacture and have extensive knowledge about we respectfully recommend that the CEC considers the following types of commercial ovens for "test-and-list" requirements:

- Electric rack ovens
- Mini rack ovens

<u>The main arguments for "test-and-list" requirements for Electric rack ovens are:</u>

- It is a commonly used product in the US with high energy consumption.
- There is a demand from end users. We are receiving more questions from end users about the energy usage of electric ovens due to the discussions about phasing out gas heated equipment in parts of the country. Currently there is no objective data to help end users to compare the energy cost to operate an electrically heated rack oven vs a gas heated rack oven in the same size.
- Manufacturers need to be pushed to test their equipment so that there is sufficient data available to start the process of establishing energy efficiency standards for this type of ovens.
- It's a simple process as the existing ASTM standard for rack ovens can be used for the testing.
- There are to our knowledge no rebate programs for electrical rack ovens. As it is still significantly cheaper to use natural gas than electricity to heat a rack oven, there will have to be incentives as well as regulations to drive a wider adoption of electrically heated rack ovens in the market.

<u>The arguments for "test-and-list" requirements for Mini-rack ovens are:</u>

- It is a commonly used product in the US and there is in our opinion a sufficient number of manufacturers to get enough data to establish Energy efficiency levels.
- Existing ASTM standards for rack ovens or convection ovens can be used for the testing.

- There is significant potential to improve the energy efficiency of many of the models in the market. This is easy to verify by comparing the energy efficiency of regular convection ovens and Combi ovens that have similar size and heating systems.
- Most manufacturers have not adopted the most energy efficient technology to increase the energy efficiency of their mini rack ovens. The likely reasons for this are that there is no public Energy efficiency data for end users to use for comparison, no Energy rebates and no ENERGY STAR requirements to meet. This product category is a good example that not all manufactures will voluntarily invest in improving the Energy efficiency of their products but opt to focus on keeping the manufacturing costs down when there is no outside pressure to improve the energy efficiency.

We do not advocate for a "test and list requirement" for the "quadruple rack ovens" as there are too few manufacturers that sell this seize rack oven in the US. Due to the limited number of manufactures it will not be feasible to establish an energy efficiency standard for this type of commercial oven.

3. Should the CEC consider aligning any proposed appliance efficiency regulations on commercial ovens with ENERGY STAR v2.2, ENERGY STAR v3.0, or some other stringency level? Please elaborate and provide as much supporting information as available.

We respectfully request that CEC consider aligning with the EPA ENERGY STAR v3.0 specification for commercial ovens. Having different versions of standards or introducing appliance efficiency requirements that differ from ENERGY STAR would cause confusion in the market and make it more difficult for equipment buyers to evaluate the energy efficiency of equipment they purchase.

4. In addition to the rebate programs offered through the IOUs, are there additional rebate programs that the CEC should be aware of?

No, all rebate programs we are aware of are offered by IOU's.

5. What impact have these rebate programs had on the market of commercial ovens? Please elaborate.

The rebate programs are appreciated by equipment buyers, but as some of the programs use qualification levels lower than the current ENRGY STAR qualification levels, customers are not encouraged by the rebate programs to select the most energy efficient ovens.

With the relatively low Energy efficiency requirements for the rebate programs, the logical conclusion is that the net impact in terms of encouraging customers to purchase **the most** Energy efficient ovens has been negligible. The main positive effect is likely that customers have been encouraged to replace old ovens and that for the most part the new ovens have had a higher energy efficiency than the ovens they replaced.

6. What impact will appliance efficiency standards on commercial ovens have on existing and future rebate programs in California? Please elaborate

The impact will depend on the structure of the rebate programs, primarily which products will be included and what qualification levels will be relative to the appliance efficiency standards.

Current rebate programs for commercial ovens in California have energy efficiency qualification levels below the current ENERGY STAR qualification levels. Implementing appliance efficiency standards that allow for only commercial ovens that qualify for ENERGY STAR to be sold, would by default direct the energy efficiency rebates towards purchases of the most efficient ovens. The exception would be for commercial oven categories that are not included in the scope of ENERGY STAR 3.0 for commercial ovens.

We respectfully suggest that appliance efficiency standards and rebate programs for Commercial ovens are aligned and structured so that they:

- Incentivize manufacturers to design, manufacture and sell ovens that meet the ENERGY STAR requirements
- Incentivize equipment buyers to choose ENERGY STAR rated ovens
- Offset at least some of the added costs related to the transition to Electrically heated ovens. Electrification would reduce the emissions from bakeries and foodservice operations that use commercial ovens but the added cost and lack of available power in many buildings are prohibitive.
- Encourage the addition of more ENERGY STAR categories for commercial ovens

Please don't hesitate to contact us if you have questions regarding this correspondence.

Best regards,

Daniel Lago
CEO Revent Incorporated