

DOCKETED

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Project Title:	Commercial Food Service Equipment (i.e. Commercial Steam Cookers, Commercial Convection Ovens, Commercial Dishwashers, and Commercial Fryer)
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*Comment Received From: ITW Food Equipment Group
Submitted On: 12/19/2023
Docket Number: 23-AAER-01*

ITW-Hobart Comments for Docket # 23-AAER-01

Additional submitted attachment is included below.

ITW Food Equipment Group
An Illinois Tool Works Company
701 S. Ridge Avenue
Troy, Ohio 45374-0001
937-332-3000

Food Equipment Group

December 19, 2023

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: ITW Food Equipment Group Comments

Dear CEC Representative,

ITW Food Equipment Group manufactures commercial ovens, fryers, steam cookers and dishwashers under the brand names of Hobart, Baxter and Vulcan. We have reviewed the material in Docket Number 23-AAER-01 and have the following comments.

- 1) **Standards for Energy Efficiency** – The most obvious choice for energy efficiency qualifications for commercial food service equipment is the EPA ENERGY STAR criteria. These requirements have been in place for many years and are currently referenced in approximately 11 state commercial foodservice equipment (CFE) standards. The ENERGY STAR criteria are based on consensus ASTM performance standards for commercial foodservice equipment.
- 2) **Scope** – Our recommendation is for the CEC to adopt language that allows products outside the scope of the ENERGY STAR specification to be exempt from the efficiency standards. If the regulation is crafted as prescriptive and attempts to apply the scope to specific variations of models, it will not be able to keep up with changes to the ENERGY STAR scope. There are variations of commercial dishwashers that do not fit into the existing categories of covered products and have therefore been deemed to be outside the scope for qualification. One example is a “two level” commercial dishwasher which combines the features of an undercounter dishwasher with an upright door machine. It is not currently eligible for ENERGY STAR qualification. However, it may not be allowed to be sold in California if the CEC regulation does not make this important distinction.

In addition, the scope must be clear regarding leased and refurbished equipment.

3) **ENERGY STAR Versions** – Many states have adopted EPA CFS ENERGY STAR criteria that are not the current version. For example, New Jersey requires commercial ovens, dishwashers and fryers to meet ENERGY STAR version V2.2, V2.0 and V2.0, respectively. The current revision level for EPA Certified models is V3.0 for each of the 3 categories. We respectfully request that CEC consider the current EPA ENERGY STAR specification revision levels for all categories of appliances. This would not only make the most impact on overall energy reduction but would also greatly simplify tracking.

4) **Certification and Marking Requirements** – Most states have adopted the State Appliance Standards Database (SASD). This organization works with manufacturers to identify products that meet all applicable state energy efficiency regulations and maintains the model numbers on their website. This is a convenient and efficient method to maintain compliance with an ever-changing landscape of energy efficiency regulations. We respectfully request CEC consider using this database to make compliance simpler for manufacturers. At the very least, if the CEC mandates their own database, providing a method to recognize the SASD database and cross-reference those models will make compliance much smoother for manufacturers.

5) **Noncompliance Enforcement** – As a manufacturer, we understand the importance of enforcement in the effectivity of efficiency regulations. However, we also are concerned about penalties for noncompliant product sold in California. As you know, large chain restaurants will often purchase and stock equipment at various locations and ship it to their stores around the country. Even though a manufacturer provides information on compliant models, we can't always control where our products are shipped and installed. Subsequent negative publications and/or fines for the non-compliant manufacturer are extremely damaging when they are often out of our control.

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

Sincerely,



Jeremy J. Clark
Electrical Engineer
Warewash Division

copies to:
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