

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Natural Resources Defense Council
New York State Energy Research and Development Authority
Northwest Energy Efficiency Alliance

July 10, 2023

Ms. Julia Hegarty
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW, Washington, DC 20585

RE: Docket Number EERE-2017-BT-STD-0022: Notice of proposed rulemaking for energy conservation standards for automatic commercial ice makers

Dear Ms. Hegarty:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), the American Council for an Energy-Efficient Economy (ACEEE), the Natural Resources Defense Council (NRDC), the New York State Energy Research and Development Authority (NYSERDA), and the Northwest Energy Efficiency Alliance (NEEA) on the notice of proposed rulemaking for energy conservation standards for automatic commercial ice makers (ACIMs). 88 Fed. Reg. 30508 (May 12, 2023). We appreciate the opportunity to provide input to the Department.

We support the proposed standards. We support DOE's proposal to adopt trial standard level (TSL) 3, which corresponds to the highest analyzed efficiency level with positive life cycle cost (LCC) savings for each equipment class.¹ DOE's analysis demonstrates that the proposed standards are technologically feasible and would achieve meaningful energy savings.

We support establishing standards for the new low-capacity equipment classes. We agree with DOE's determination that low-capacity products (with harvest rates of ≤ 50 lb ice/24 hours) meet the definition of ACIMs. DOE notes in the NOPR that the Department "found that manufacturers specifically market certain low-capacity automatic commercial ice makers for commercial use and/or using commercial air and water ambient rating conditions" and that "distributors sell low-capacity automatic commercial ice makers for commercial use, including automatic commercial ice makers from the proposed low-capacity ACIM equipment classes."² DOE's analysis shows that there is significant opportunity to improve the efficiency of low-capacity ACIMs. For example, for low-capacity batch, self-contained, air-cooled (B-SC-A) machines, DOE found that for units with approximately the same harvest rate, the least efficient unit

¹ We note that there were no efficiency levels beyond baseline that DOE analyzed for which the following directly analyzed product classes had positive LCC savings: B-IMH-W (≥ 300 and < 785); B-IMH-W (≥ 785 and $1,500$); B-SC-A (> 50 and < 134); and C-IMH-W (> 50 and < 801). Therefore, for these classes (and the associated secondary equipment classes shown in Table 5.2.5), DOE has proposed no update to the energy conservation standard except to reflect the updated efficiency due to refrigerant change (Table 5.4.1).

<https://www.regulations.gov/document/EERE-2017-BT-STD-0022-0032> p. 5-6 and 5-13.


² 88 Fed. Reg. 30525.

consumes nearly three times the energy of the most efficient unit.³ Establishing standards for low-capacity ACIMs will incentivize efficient designs and ensure that these products aren't unnecessarily wasteful of energy.

We support DOE's approach of using adjusted baselines that incorporate the energy efficiency improvements associated with the use of certain low-GWP refrigerants. In the NOPR, DOE explains that "the proposed date of the ban of manufacture or import of refrigerants prohibited in automatic commercial ice makers is at least 2 years earlier than the expected compliance date for any amended ACIM standards."⁴ DOE therefore conducted the analysis for the NOPR assuming that any energy savings associated with R-290 or R-600a, two refrigerants that comply with the December 2022 EPA NOPR,⁵ would be realized in baseline models impacted by this rulemaking. We support this approach of adjusting the baseline efficiency levels to reflect these efficiency gains, which we believe appropriately reflects what the ACIM market will look like in advance of the compliance date of any amended standards.

Thank you for considering these comments.

Sincerely,



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³ As seen in Figure 3.3.19, for units with harvest rates of about 45 lbs/24 hours, the most efficient unit appears to use about 7 kWh/100 lbs, while the least efficient unit uses about 19 kWh/100 lb.

⁴ <https://www.regulations.gov/document/EERE-2017-BT-STD-0022-0032> p. 3-42.

⁵ <https://www.regulations.gov/document/EERE-2017-BT-STD-0022-0036> p. 30532.

⁵ <https://www.govinfo.gov/content/pkg/FR-2022-12-15/pdf/2022-26981.pdf>