

Appliance Standards Awareness Project

October 9, 2018

Tanja Crk
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Draft 1 Version 4.0 Specification for Vending Machines

Dear Ms. Crk,

The letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the Draft 1 Version 4.0 ENERGY STAR Vending Machines Specification released on September 10, 2018. We appreciate the opportunity to comment.

We support the proposed expansion of scope. EPA proposes to expand the refrigerated beverage vending machine scope to include Combination A and Combination B machines, which are now covered by DOE standards. We support this alignment with the DOE scope. We also support EPA's plan to investigate expanding the scope to cover food vending machines and to develop a test method for these products.

We support the proposed Maximum Daily Energy Consumption (MDEC) requirements for Version 4.0. The proposed MDEC levels would provide meaningful energy savings beyond the 2019 DOE minimum standards—10% savings for Class A and Combination A machines and 15% savings for Class B and Combination B machines. DOE's analysis for the last rulemaking found that significant efficiency improvements beyond the 2019 standards are possible: energy savings of 35% to 43% depending on the product category.¹ Further, these savings do not consider the additional potential savings that can be achieved by using propane as the refrigerant. As EPA notes, DOE estimated that switching to propane reduces compressor power by 15%.² Other technology options to improve the efficiency of refrigerated beverage vending machines include enhanced glass packs, improved evaporator and condenser coils, LED lighting, ECM fan motors, and vacuum insulated panels.

Thank you for considering these comments.

Sincerely,



Joanna Mauer
Technical Advocacy Manager

¹ 81 Fed. Reg. 1082. (January 8, 2016). Table V.1 TSL 5 relative to TSL 3.

²

https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Refrigerated%20Beverage%20Vending%20Machines%20Version%204.0%20Draft%201_0.pdf.