

Advocacy Comments on DOE’s “Energy Conservation Standards for Refrigerated Bottled or Canned Beverage Vending Machines”

On November 23, 2015, the Office of Advocacy (Advocacy) filed public comments with the Department of Energy (DOE) in response to the proposed rule “Energy Conservation Standards for Refrigerated Bottled or Canned Beverage Vending Machines.”

- On August 19, 2015, DOE issued “Energy Conservation Standards for Refrigerated Bottled or Canned Beverage Vending Machines” soliciting comments on the proposed rule.
- The proposed rule will have a significant economic impact on small manufacturers of beverage vending machines.
- DOE has estimated conversion costs at \$217,000 per manufacturer; however, Advocacy’s conversations with small businesses estimate their compliance costs will exceed \$1,000,000.
- Advocacy is concerned that the baseline for certain product classes of beverage vending machines may not accurately capture the current state of technology in the industry, which could lead to inaccurate cost estimates. DOE is constructing the baseline from the most inefficient technology choices.
- In addition to the proposed rule at issue, the Environmental Protection Agency’s Significant New Alternatives Policy will require that manufacturers use new refrigerants like carbon dioxide or propane to achieve the proposed beverage vending machines efficiency levels.
- Small businesses are concerned that the proposed standards are neither technologically nor economically feasible within the three-year period prescribed by DOE.
- Advocacy recommends that DOE use its discretion to adopt an alternative to the proposed standard that is technologically and economically feasible for small manufacturers of beverage vending machines.

For more information, visit Advocacy’s website at <http://www.sba.gov/advocacy> or contact Assistant Chief Counsel Rosalyn Steward at 202-205-7013 or by email at rosalyn.steward@sba.gov.