

Advocacy Comments on Proposed Energy Efficiency Test Procedures for Walk-in Coolers and Freezers

On October 12, 2010, the Office of Advocacy (Advocacy) filed public comments with the Department of Energy (DOE) regarding its proposed energy efficiency testing procedures for walk-in coolers and freezers. A copy of Advocacy's comments may be viewed at www.sba.gov/advo/laws/comments.

- On January 4, 2010, DOE published proposed energy efficiency test procedures for commercial walk-in coolers and freezers.¹ Following publication of the proposal, DOE received significant feedback from the walk-in manufacturing industry. In response, DOE published a supplemental notice of proposed rulemaking incorporating several proposed changes to the test procedures on September 9, 2010.
- Advocacy noted that small manufacturers represent a large proportion of manufacturers supplying custom walk-in coolers and freezers, and produce a larger variety of “basic models”, as defined by the proposal. Because the test procedures would require testing for every “basic model” produced by a manufacturer, small manufacturers would face significantly disproportional burdens under the proposed procedures.
- Advocacy recommended that DOE consider adopting an alternative test procedure that would allow manufacturers to rely on the certifications of walk-in component suppliers for test results, and manufacturers could then use these values in the calculations of energy consumption for each basic model they produce. Advocacy also recommended that DOE consider allowing manufacturers to group basic models into a “family” of models and only requires the lowest-efficiency basic model in the family to be certified.

For more information, contact Jamie Belcore Saloom by email at Jamie.Belcore@sba.gov, or by phone at 202/205-6533.

¹ *Energy Conservation Program: Test Procedures for Walk-in Coolers and Walk-in Freezers; Notice of Proposed Rulemaking and Public Meeting*, 75 Fed. Reg. 186 (January 4, 2010).