

On October 20, 2011, representatives of Howe Corporation, Gade Environmental, and Beecon ProfServe met with DOE to discuss the proposed rules EERE-2010 BT-TP-0036 RIN 1904-AC38 Energy Efficiency Program for Certain Commercial and Industrial Equipment: Test Procedures for Commercial Ice Makers. The meeting was held at the request of Howe Corporation at the DOE offices in Washington DC.

In attendance:

Ari Altman, DOE  
Ashley Armstrong, DOE  
Robert Bittner, Beecon ProfServe  
John Cymbalsky, DOE  
Mary Gade, Gade Environmental Group  
Mary Howe, Howe Corporation  
Charles Llenza, DOE  
Jeff Mackowiak, Howe Corporation  
Mark O'Malley, Gade Environmental Group

Howe Corporation introduced and discussed the following concerns regarding the NOPR. For reference, a copy of the comments by Howe Corporation submitted on June 3, 2011 to the DOE are attached.

1. Industry Involvement in the Rulemaking Process

Howe Corporation respectfully submits that the current rulemaking process did not fully consider small companies due to reliance on input from member-based trade associations that represent large companies.

2. Ice Quality Adjustment Factor

- a. Howe Corporation respectfully requests that the Ice Quality Adjustment Factor be included and required by the Final Rule to reflect the use of continuous production ACIM's across all applications, not exclusively beverage applications.
- b. In addition, Howe Corporation requests that potable water usage be stated for all continuous production ACIM's in order to accurately calculate both the amount of chilled water that is drained away in the process of ice production and the energy used to chill this waste water.
- c. Howe Corporation also requests that the IQAF should provide for sub-cooled ice by allowing an IQAF with a value of less than one in order to accurately account for the amount of energy expended for the actual cooling capacity of the ice.
- d. Howe Corporation respectfully submits that the Ice Quality Adjustment factor be referred to as the Water Content Adjustment Factor, as ASHRAE does not define Ice Quality and AHRI refers to Harvest Water Content.

Re: Meeting of October 20, 2011  
EERE-2010 BT-TP-0036  
RIN 1904-AC38  
Energy Efficiency Program for Certain Commercial and Industrial Equipment: Test Procedures for  
Commercial Ice Makers  
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3. Remote ACIM's

Howe Corporation respectfully requests that, until an Alternative Rating Method is in place, remote ACIM's intended for use with remote parallel compressor racks be included in the DOE final ruling using the remote ACIM including a remote condensing unit test data as discussed in the NOPR Page 18434 Paragraph 1. Remote parallel compressor racks are inherently more efficient than a dedicated remote condensing unit as the rack systems provide the benefit of lower condensing temperatures, mechanical and/or natural sub-cooled liquid supply with efficient partial load capacity control and heat reclaim and also due to the similarities of these systems to the remote condensing units as defined in the Rulemaking Framework for Commercial Refrigeration Equipment.

4. Cost of Testing

Howe Corporation respectfully submits that the cost of testing was underestimated for manufacturers producing remote ACIM's due to the number of available configurations of remote ACIM's and would be excessive for small manufacturers. Attached is a copy of the updated information regarding SKU's that was provided at the October 20 meeting. Any grouping of units that would allow for reduced physical testing would lessen this financial burden.

Submitted by:  
Mary C. Howe  
Howe Corporation  
1650 North Elston Avenue  
Chicago, Illinois 60642