NAMA

Serving the Vending, OCS and Foodservice Management Industries

DOCKET
04-AAER-1
DATE MAY 28 2004
RECD. NOV 1 2004

Memorandum

To: Michael Martin
California Energy Commission,
Sacramento, California

From: Larry M. Eils, Senior Director Technical Services, NAMA
Brian Allen, Director Government Affairs, NAMA

Date: May 28, 2004

Re: Docket No. 04-AAER-1
Appliance Efficiency Regulations
Refrigerated Canned and Bottled Beverage Vending Machines

We want to apologize for the National Automatic Merchandising Association, NAMA, not being present at either of your Workshops concerning the update of Appliance Efficiency Regulations. However, the manufacturer members of NAMA would like to take this opportunity to present our comments and concerns concerning the proposed update for refrigerated canned and bottled beverage vending machines.

First, we concur with the recommendation to use the ASHRAE test method for energy consumption set forth in the report "Analysis of Standards Options for Refrigerated Beverage Vending Machines" prepared by the Pacific Gas and Electric Company dated May 5, 2004. The industry has spent considerable time developing the recent revision to ASHRAE Standard 32.1 and since the U.S.EPA also uses this for their ENERGY STAR Program as their standardized test method, this duality makes it much easier for manufacturers to test their machines.

Our second comment has to do with the doors on vending machines. We noticed in Table A-6 that the column "Doors" was marked "Not Applicable" for vending machines. We do not agree with this stipulation for the industry currently manufactures glass front refrigerated bottled beverage vending machines and the market is expected to increase. Since there is a difference in the energy consumption between these two types of machines because of the doors we are requesting that a second maximum daily energy consumption level be set for machines with glass front doors similar to that done for reach-in refrigerated cabinets in the same Table. I have assurances from the manufacturers of these machines that they would be more than willing to work with the Commission in the development of an energy consumption level that would be acceptable to both parties.

Finally, we would like to ask the Commission why the U.S. EPA ENERGY STAR Program energy consumption numbers were not used in the Table A-6 update. We do realize that the energy consumption numbers are close but the industry has spent more than 3 years developing the Eligibility Requirements that could be met and obtained by an industry that has been extremely slow in its recovery since the economic turn down of 2001. Yes, the industry is committed to developing and making available energy efficient vending machines but we ask, at the same time, that the California Energy Commission work with the industry in setting reasonable energy consumption requirements that do not require a large expenditure of capital that is not readily available at this time.

We look forward to hearing from you regarding these concerns and developing a dialogue in the creation of a new energy consumption category for refrigerated bottled beverage vending machines with glass front doors.

The National Automatic Merchandising Association . www.vending.org
HEADQUARTERS: 20 N. Wacker Drive, Suite 3500, Chicago, IL 60606-3102, Voice: 312/ 346-0370, Fax: 312/ 704-4140
EASTERN OFFICE: 783 Station Street, Unit 1D Herndon, VA 20170-4607, Voice: 703/435-1210, Fax: 703/435-6389
SOUTHERN OFFICE: 1521 Johnson Ferry Rd., Suite 110, Marietta, GA 30062, Voice: 678/560-8705, Fax: 678/560-8702
WESTERN OFFICE: 150 South Los Robles Avenue, Suite 830, Pasadena, CA 91101, Voice: 626/229-0900, Fax: 626/229-0777