

April 20, 2012

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J
1000 Independence Avenue, SW
Washington, DC 20585-0121

RE: Docket Number EERE-2010-BT-STD-0037: Preliminary Technical Support Document for Automatic Commercial Ice Makers

Dear Ms. Edwards:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) in response to the Department of Energy (DOE) request for comments on the preliminary technical support document (TSD) for automatic commercial ice makers. 77 Fed. Reg. 3404 (January 24, 2012). We appreciate the opportunity to provide input to the Department. We believe that higher efficiency levels than the levels that DOE identified as the “max tech” levels may be technologically feasible. Below we provide a recommendation for an additional technology option that DOE should consider in the analysis.

DOE should include microchannel heat exchangers as a technology option. For air-cooled automatic ice makers, DOE evaluated condenser technology options that included increased surface area, enhanced fin surfaces, and increased air flow. However, DOE did not consider microchannel heat exchangers as an option for improving efficiency.¹ We are not aware of automatic ice makers that are currently on the market that incorporate microchannel heat exchangers. However, we have learned that manufacturers of automatic ice makers have tested prototype units that use microchannel condensers and that they have seen significant energy efficiency increases.²

Thank you very much for considering these comments.

Sincerely,



Joanna Mauer
Technical Advocacy Coordinator

¹ Preliminary Technical Support Document. p. 3-25.

² Personal communication between Joanna Mauer of ASAP and Jim Bogart of Alcoil. April 12, 2012.