

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy

June 27, 2022

Dr. Stephanie Johnson
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies, EE-2J
1000 Independence Avenue SW, Washington, DC 20585

RE: Docket Number EERE-2020-BT-STD-0014: Notice of Availability of Preliminary Technical Support Document for Refrigerated Bottled or Canned Beverage Vending Machines

Dear Dr. Johnson:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and the American Council for an Energy-Efficient Economy (ACEEE) on the notice of webinar and availability of preliminary technical support document (TSD) for Refrigerated Bottled or Canned Beverage Vending Machines (BVMs). 87 FR 24469 (April, 26 2022). We appreciate the opportunity to provide input to the Department.

We encourage DOE to include low-power coin and bill payment mechanisms as a design option. In the PTSD, DOE retained, but did not directly consider low-power payment mechanisms as a design option. However, in the March 2022 test procedures NOPR, DOE determined that coin and bill payment mechanisms are typically sold or shipped with BVMs, and proposed to require these devices to remain energized during testing.¹ Since BVMs are typically sold or shipped with coin and bill payment mechanisms, and their associated energy consumption will be captured in the proposed test procedures, we encourage DOE to include low-power coin and bill payment mechanisms as a design option in the engineering analysis.

Thank you for considering these comments.

Sincerely,



Rachel Margolis
Technical Advocacy Associate
Appliance Standards Awareness Project



Amber Wood
Director, Buildings Program
American Council for an Energy-Efficient Economy

¹ <https://www.regulations.gov/document/EERE-2021-BT-TP-0007-0008>. p. 18944