



June 18, 2021

United States Department of Energy
Office of Energy Efficiency and Renewable Energy
Docket Management
Building Technologies Office, EE-5B
1000 Independence Avenue SW
Washington, DC 20585-0121

Submitted via www.regulations.gov

Re: NAMA Comments on Energy Conservation Program: Test Procedures for Certain Commercial and Industrial Equipment; Early Assessment Review: Refrigerated Bottled or Canned Beverage Vending Machines— Doc. No. EERE-2021-BT-TP-0007

Dear Sir or Madam:

The National Automatic Merchandising Association (NAMA) appreciates the opportunity to submit comments in response to the Office of Energy Efficiency and Renewable Energy's request for information to determine whether amendments to the test procedure for bottled or canned beverage vending machines are warranted.

Founded in 1936, NAMA is the association representing the U.S. convenience services industry, with its core membership comprised of owners and operators of vending machines, micro markets, and office coffee, tea, water and pantry services. With nearly 1,000 member companies – including many of the world's most recognized brands – NAMA provides advocacy, education and research for its membership. The convenience services industry employs nearly 160,000 Americans – the majority employed by small businesses – contributing a total economic impact of over \$31 billion to the U.S. economy annually.

NAMA has enjoyed its positive working relationship with the Department of Energy and the Office of Energy Efficiency and Renewable Energy over the years and appreciates efforts to continuously engage with stakeholders as it seeks further review current energy conservation program procedures and policies. **However, we respectfully urge EERE to postpone amending procedure for beverage vending machines due to ongoing business interruptions and economic hardships caused by the COVID-19 public health emergency.**

NAMA research shows that as of September 2020, approximately 50,000 jobs (28.74% of the industry) had been lost, and many businesses closed for good. The same research shows that remaining companies are still operating well below previous business levels.

State mandated shutdowns produced a vast reduction in serviceable vending locations throughout the United States. Office buildings, schools, colleges and universities, and most other

locations where refrigerated vending machines are typically found remain closed to this day. These shutdowns caused many operators to reduce staffing levels to remain operational. As the nation begins to reopen, the convenience services industry is regaining business momentum. Unfortunately, due to the patchwork of state-by-state shutdown restrictions and reopening guidance, client locations are returning at a slow and sporadic pace. Amending test procedures at this time would be place an undue burden on an already mired industry.

Additionally, the industry is currently partnering in a cooperative research and development agreement (CRADA) through the NAMA foundation and the Department of Energy at Oak Ridge National Laboratory (ORNL).

The CRADA – in its second year – is collecting vital information that will be used to inform how low global warming potential (GWP) refrigerants will be used to increase energy efficiency and comply with safety standards as states and the nation phase down the use of hydrofluorocarbon (HFC) refrigerants and the transition to low-GWP A3 refrigerants.

NAMA was successful in amending U.S. safety standards with The American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) and UL to allow for low levels of these refrigerants to be used in refrigerated vending machines – work that will lead to significant energy savings in operation.

Manufacturers and the engineers at ORNL are now focusing on designing machines that protect against inadvertent leak situations and necessary operating functions or components that reduce the concentration of these new A3, A2, or A2L refrigerants should a leak arise. This new technology or operating mitigation techniques may use a small amount of energy but are necessary for safety. It is NAMA's belief that any test procedure for vending machines should not include the energy use of these new safety measures in the total energy of the product. Thus, we urge the EERE to postpone any amendments to test procedures wait until its CRADA with DOE is concluded and accurate information on this technology would be available.

Thank you again for the opportunity to provide comments and we look forward to providing more feedback to the Department as we gather additional information regarding potential changes to the test procedure for beverage vending machines and as the CRADA between the NAMA Foundation and the Department of Energy progresses.

Please to not hesitate to contact me at mgoscinski@namanow.org with any questions.

Sincerely,



Mike Goscinski
Senior Director, External Affairs