

This final document represents the definitive view of the agency on the questions addressed and may be relied upon by the regulated industry and members of the public.

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**Guidance Type:** Certification and CCMS, Test Procedures, Enforcement

**Category:** Residential Products

**Product:** Refrigerators, refrigerator-freezers, and freezers

**Guidance Version:** FINAL

**Issued:** May 2, 2014

**Q: Some refrigerator and freezer models** leave the manufacturer's warehouse without an icemaker, but are designed such that an icemaker could be installed at a later point in the distribution chain or by the user. How should these models, which are commonly referred to as "kitable" or "icemaker ready" models, be tested and certified to DOE, and how should model numbers be assigned to them?

**A: Based on descriptions provided to the U.S. Department of Energy (DOE)** by manufacturers and the industry trade association, DOE understands that these refrigerator or freezer models are currently marketed in three possible ways: 1) without an automatic icemaker; 2) with an automatic icemaker; or 3) without an automatic icemaker but as a product that is capable of having an icemaker installed after it leaves the factory (e.g., "icemaker ready"). DOE is clarifying that each configuration that a manufacturer offers for sale (e.g., by advertising the refrigerator-freezer on its website) must be tested and subsequently certified in accordance with DOE's regulations. Consequently:

- If the manufacturer elects to offer for sale a configuration that does not have icemaking capability, it must be tested and certified as a non-icemaker model (e.g., product class 3, 5, or 4).
- If the manufacturer elects to offer for sale a configuration that includes an icemaker, it must be tested and certified as an icemaker model (e.g., product class 3I, 5I, or 7).
- If the manufacturer elects to offer for sale a model for use in two configurations (e.g., by advertising it as a product that does not have an icemaker, but is capable of having an icemaker installed as an optional feature (i.e., icemaker ready)), that model must be addressed and treated as two separate basic models (e.g., product classes 3 and 3I). In such a case, the manufacturer may assign the same individual model number for both configurations, but must use separate and distinguishable basic model numbers in its DOE certification for the non-icemaker and icemaker versions. In this situation, a manufacturer need not conduct the laboratory portion of the required DOE test procedure twice (for each tested unit) before certifying compliance for each of the two basic models. (For example, a manufacturer could conduct the laboratory portion of the required test procedure on the minimum two-unit sample required under 10 CFR Part 429 in the non-icemaker configuration and then complete the

calculations portion of the test procedure for both the non-icemaker and the icemaker basic models based on those laboratory results.)

This clarification applies to products tested using both Appendix A and Appendix B, which will become mandatory starting on September 15, 2014.

**Background:** In response to the draft guidance document published on November 13, 2013, DOE received two comments, one from the Association of Home Appliance Manufacturers (AHAM) and one from GE, both of which expressed objection to the requirement that a product offered for sale in two configurations must be treated as two separate basic models and certified in both configurations. In their comments, AHAM and GE both stated that the additional reporting and labeling burden of such a requirement was unjustified and that it would create confusion in the marketplace. DOE understands the concerns expressed in these comments and has coordinated with the Federal Trade Commission and the ENERGY STAR program to minimize any additional labeling or reporting burdens that could result from this requirement; however, DOE has determined that the approach described in the draft guidance is necessary in order to ensure compliance with its regulations and is finalizing the November 2013 guidance without alteration.