

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

June 30, 2023

Tanja Crk
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Version 1.0 Residential Electric Cooking Products Draft 2 Specification

Dear Ms. Crk,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and American Council for an Energy-Efficient Economy (ACEEE) on the Residential Electric Cooking Products Version 1.0 Draft 2 Specification released on May 31, 2023. We appreciate the opportunity to comment.

We support the proposed ENERGY STAR criteria for residential electric cooking products. EPA estimates that the proposed criteria would result in per-unit lifetime operating cost savings of \$87 and CO₂ emissions reductions of over 900 lbs.¹ In the Draft 2 Data Package, EPA notes that some of the more efficient products on the market are priced similar to baseline products, and therefore, paybacks for higher efficiency products can be as low as zero.² In the analysis for the Department of Energy (DOE) notice of proposed rulemaking (NOPR) for cooking products standards, DOE found that the additional cost associated with products at Efficiency Level 2, which approximates the proposed ENERGY STAR level, would be paid back on average within 3 years.³ While the passage of the Inflation Reduction Act (IRA) has enabled substantial funding for consumers to purchase efficient electric appliances, there is currently no ENERGY STAR specification for residential electric cooking products. Thus, we urge EPA to promptly finalize this specification so that consumers are provided with adequate information on the efficiency of electric cooking products when taking advantage of tax credits and/or rebates provided by the IRA.

We support a single product class. In the draft specification, EPA proposed one product class for all residential electric cooking tops. Induction cooking tops provide the same basic function of cooking and heating as other electric cooking top types. Additionally, as EPA notes in the Draft 1 Stakeholder Comment Response Matrix, coil electric cooking tops have limited

¹ ENERGY STAR Version 1.0 Residential Electric Cooking Products Draft 2 Data & Analysis.
https://cmadmin.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Electric%20Cooking%20Products%20V1.0%20Draft%202%20Data%20Package.xlsx?_gl=1*_eh20ds*_ga*MjYzODYwMDg3LjE1OTUyNzgxMzc.*_ga_S0KJTVVLQ6*MTY4NjY2NzU1OC4xNTQuMC4xNjg2NjY3NTU4LjAuMC4w.

² Ibid.

³ Ibid.

differentiation from smooth electric cooking tops.⁴ Thus, we believe a single product class for all electric cooking top types is appropriate for this specification.

We support using the DOE test procedure for the qualification of products. DOE finalized the test procedure for electric cooking tops in 2022 after conducting significant round robin testing, which demonstrated minimal variability for electric cooking tops (i.e., repeatability and reproducibility coefficients of variation under 2%).⁵ We believe that the DOE test procedure is adequately repeatable and reproducible without being overly burdensome to conduct.

We support the reporting requirements proposed in the Draft 2 specification. In addition to energy efficiency levels, EPA is proposing to include reporting requirements that would provide consumers with supplementary information when comparing ENERGY STAR certified products. In addition, these reporting requirements could also help EPA further refine the ENERGY STAR specification in the future.

Thank you for considering these comments.

Sincerely,



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American Council for an Energy-Efficient Economy

⁴ ENERGY STAR Version 1.0 Residential Electric Cooking Products Draft 1 Comment Response Matrix.
https://cmadmin.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Electric%20Cooking%20Products%20V1%20Draft%201%20Comment%20Response%20Matrix_0.pdf?_gl=1*u9msg1*_ga*MjYzODYwMDg3LjE1OTUyNzgxMzc.*_ga_S0KJTVVLQ6*MTY4NjkzMDU2NS4xNjQuMS4xNjg2OTMwNjEzLjAuMC4w

⁵ 86 Fed. Reg. 60980. (November 4, 2021).