

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

February 10, 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 1 Specification

Dear Ms. Crk,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and American Council for an Energy-Efficiency Economy (ACEEE) on the Residential Electric Cooking Products Version 1.0 Draft 1 Specification released on December 16, 2022. We appreciate the opportunity to comment.

We strongly support EPA establishing an ENERGY STAR specification for residential electric cooking products. There is currently no ENERGY STAR specification for residential electric cooking products, which are present in over 60% of U.S. homes,¹ so the potential for energy savings may be considerable. We support the efficiency level proposed in the draft 1 specification, which is 16% more efficient than the highest energy consuming electric cooking product evaluated by EPA.² We understand that EPA is basing the draft criteria on the limited test data currently available. Thus, we urge EPA to consider revisiting the criteria as soon as there is a more comprehensive data set of models available.

We encourage EPA to consider specifying a low-power mode energy use requirement for cooking tops. The draft 1 specification includes criteria for the low-power mode energy consumption of the electric oven component of a combined electric cooking product (*i.e.*, a conventional electric range). However, there is no low-power mode energy consumption requirement for the cooking top component of a conventional range or for a standalone conventional electric cooking top. Low-power mode energy use across individual cooking product models has the potential to vary significantly. EPA's test data shows that the combined annual low-power mode energy consumption for conventional ranges and standalone cooking tops can range from 3 to 47 kWh/yr and 0 to 25 kWh/yr, respectively.³ Thus, a low-power mode criterion could help ensure that cooktops are not needlessly wasting energy in low-power mode.

¹ <https://www.eia.gov/consumption/residential/data/2020/>.

²

https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Cooking%20Products%20Version%201.0%20Draft%201%20Specification_0.pdf.

³ ENERGY STAR Version 1.0 Residential Electric Cooking Products Draft 1 Data & Analysis.

<https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Electric%20Cooking%20Products%20V1.0%20Draft%201%20Data%20Package.xlsx>.

We support the additional reporting requirements proposed in the draft 1 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. This would require manufacturers to report important data such as the total number of cooking zones in the cooking top, the maximum input rate of each cooking zone, and the cooking top type. In addition to the proposed reporting requirements, we encourage EPA to consider requiring manufacturers to report whether a unit is portable and if an induction unit has active cooling technology that turns on after the burners are turned off.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kanchan Swaroop', written over a light gray rectangular background.

Kanchan Swaroop
Technical Advocacy Associate
Appliance Standards Awareness Project

A handwritten signature in black ink, appearing to read 'Jennifer Amann', written over a light gray rectangular background.

Jennifer Amann
Senior Fellow
American Council for an Energy-Efficient Economy