

Appliance Standards Awareness Project

December 2, 2021

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

**RE: ENERGY STAR® Commercial Ovens Version 3.0 Draft 2 Specification**

Dear Ms. Crk,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the Commercial Ovens Version 3.0 Draft 2 Specification released on October 14, 2021. We appreciate the opportunity to comment.

**We support EPA’s efforts to revise the ENERGY STAR criteria for commercial ovens to better recognize top performing products on the market.** The estimated market penetration for ENERGY STAR commercial ovens increased from 51% to 54% from 2019 to 2020, which further emphasizes the need for stronger performance criteria for this product category.<sup>1</sup> The proposed Version 3.0 criteria would provide large cost-effective savings. As EPA shows in the data package for the Draft 2 Specification, if all commercial ovens met the proposed criteria, annual energy cost savings would reach over \$240 million per year nationally and annual CO<sub>2</sub> emissions would be reduced by over 2 million metric tons.<sup>2</sup> Furthermore, EPA estimates that the average payback period is less than two years for each of the product classes.

Although EPA has proposed robust efficiency levels for most product classes, we encourage EPA to revisit the proposed criteria for half-size electric convection ovens, which is equivalent to the version 2.2 criteria. EPA should consider strengthening the criteria for cooking energy efficiency and idle energy rate to greater than or equal to 75% and less than or equal to 0.9kW, respectively. These levels would align with the Tier 2 efficiency requirements outlined in the Consortium for Energy Efficiency (CEE) High Efficiency Specification for Commercial Convection Ovens.<sup>3</sup> As seen in Figure 1, revising the standard to align with CEE Tier 2 requirements would still maintain a number of qualifying models and incentivize

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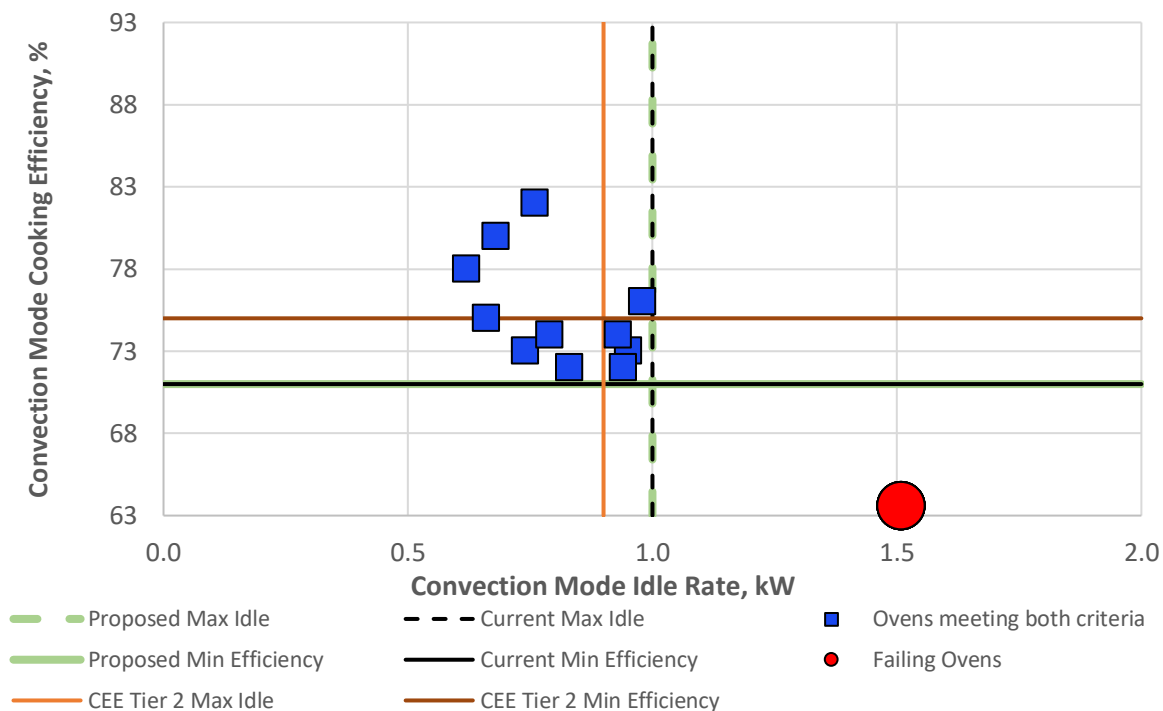
<sup>1</sup> See <https://www.energystar.gov/sites/default/files/asset/document/2019%20Unit%20Shipment%20Data%20Summary%20Report.pdf> and [https://www.energystar.gov/sites/default/files/asset/document/2020%20USD%20Summary%20Report\\_Lighting%20%20EVSE%20Update.pdf](https://www.energystar.gov/sites/default/files/asset/document/2020%20USD%20Summary%20Report_Lighting%20%20EVSE%20Update.pdf).

<sup>2</sup> [https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%203.0%20Commercial%20Ovens%20Draft%20%20Data%20Pack\\_0.xlsx](https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%203.0%20Commercial%20Ovens%20Draft%20%20Data%20Pack_0.xlsx).

<sup>3</sup> [https://library.cee1.org/system/files/library/7504/CEE\\_Convection\\_Ovens\\_Specification\\_effective\\_January\\_1\\_2015\\_updated\\_July\\_7\\_2015.pdf](https://library.cee1.org/system/files/library/7504/CEE_Convection_Ovens_Specification_effective_January_1_2015_updated_July_7_2015.pdf).

manufacturers to develop more efficient products that go beyond the Tier 1 requirements. Furthermore, the proposed ENERGY STAR criteria for full-size electric and gas convection ovens are already similar, if not equivalent (as for the full-size electric product category), to the CEE Tier 2 performance criteria.

**Figure 1. Half-size electric convection ovens idle rate and efficiency chart with CEE Tier 2 thresholds**



We understand that some stakeholders have concerns with revising the steam mode idle rate and cooking-efficiency for combination ovens until a standardized maximum humidity level is established for testing. We encourage EPA to promptly revisit and update these criteria once the ASTM committee has agreed on a standard humidity level for testing.

**We support establishing criteria for water consumption rates in combination ovens and reporting requirements for water consumption in convection and rack ovens.** There are currently no water consumption thresholds for ENERGY STAR qualified commercial ovens. EPA estimates that the proposed water consumption criteria for combination ovens can save over 40,000 and 70,000 gallons of water per unit per year for electric and gas combination ovens, respectively.<sup>4</sup> We support the addition of reporting requirements for water use in convection and rack ovens with moisture or steam injection modes which will assist in informing consumers about water consumption rates and provide an understanding of future savings opportunities for these products. In the future, we encourage EPA to use these data to establish water consumption criteria for convection and rack ovens as well.

<sup>4</sup>

[https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%203.0%20Commercial%20Ovens%20Draft%20%20Data%20Pack\\_0.xlsx](https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%203.0%20Commercial%20Ovens%20Draft%20%20Data%20Pack_0.xlsx)

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Swaroop', is centered below the word 'Sincerely,'. The signature is written in a cursive style with a large 'K' and 'S'.

Kanchan Swaroop  
Technical Advocacy Associate  
Appliance Standards Awareness Project