

BSH Home Appliances Corporation, 1901 Main Street, Suite 600, Irvine, CA 92614

June 30, 2023

Via E-Mail

Tanja Crk
Product Manager
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

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

Dear Ms. Crk,

BSH Home Appliances Corporation (“BSH”) respectfully submits the following comments to the Environmental Protection Agency (EPA) regarding the ENERGY STAR Version 1.0 Residential Electric Cooking Products Draft 2 Specification. BSH appreciates the opportunity to submit these comments for consideration.

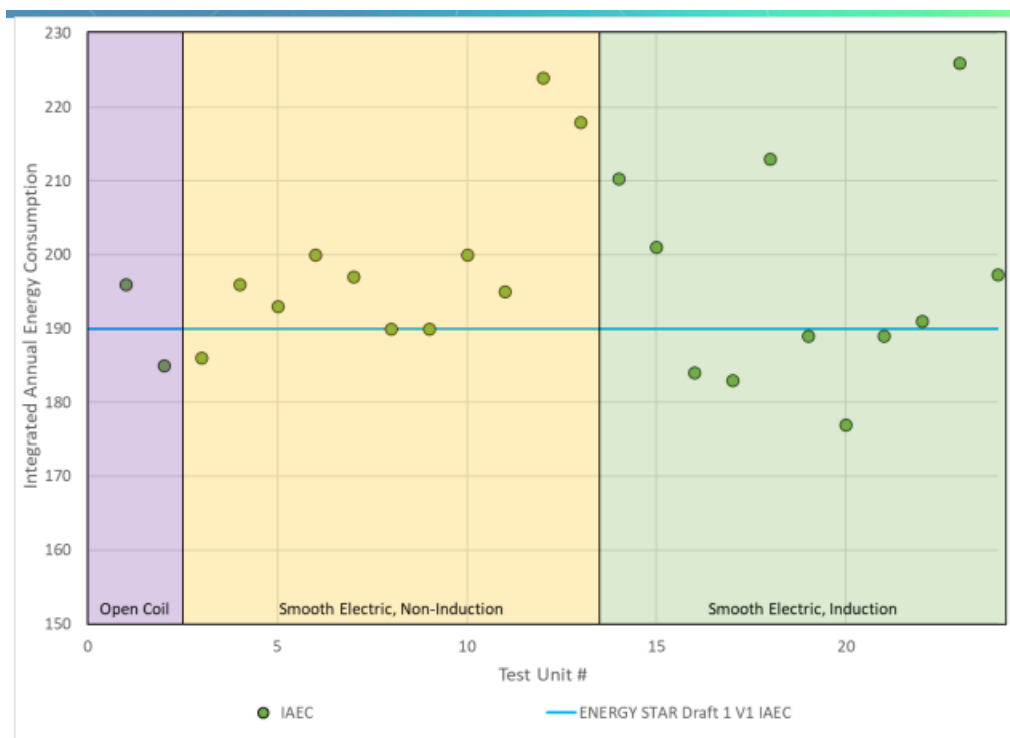
BSH Home Appliances Corporation, headquartered in Irvine, California, produces and markets small and major home appliances that are known for their high-quality and superior innovation. BSH sells its Gaggenau, Thermador and Bosch branded products throughout North America, through distributors, independent appliance dealers, national and regional retailers, builders and large buying groups. BSH supports efforts to protect our environment and accepts a responsibility in building a sustainable future for all. <https://www.bsh-group.com/sustainability/sustainability-at-bsh>

EPA should wait to finalize its ENERGY STAR V1 Specification until DOE issues a final rule on energy conservation standards for conventional cooking products and thereafter, adjust ENERGY STAR proposed levels to account for high variation inherent in the test procedure.

The Department of Energy (DOE) analysis and proposed energy levels did not account for test procedure variation. DOE indicated in the notice of data availability (NODA) that each data point presented in the supplemental notice of proposed rulemaking (SNOPR) technical support document (TSD) represents one test of a conventional cooktop conducted at one test laboratory. DOE released repeatability and reproducibility analysis in the test procedure NODA. This data shows high reproducibility variation: According to DOE’s analysis, there could be as much as an 8.4 percent difference for gas products when comparing Lab A to Lab B and a 5.6 percent difference for electric products when comparing Lab A to Lab C. DOE also indicated during the January 31, 2023 public meeting that it did not account for test procedure variation in its analysis

of which energy conservation standards to propose. DOE’s oversight to account for test procedure variation means that DOE proposed to set a standard based on measured values of products. This is not consistent with its approach elsewhere. DOE has expressly permitted and encouraged conservative rating, yet it failed to account for it in its analysis. BSH is optimistically anticipating DOE will correct this oversight and adjust proposed energy levels; accordingly, EPA should do the same. EPA should not rush to finalize its specification before there is a standard in place upon which EPA can base a specification.

EPA should establish ENERGY STAR levels that allow for a greater portion of radiant cooktops to qualify, or ENERGY STAR should not cover the product type.



BSH is supportive of and seeks to be a partner in efforts to ensure consumers have access to efficient home appliances. BSH is concerned that the energy levels proposed in V1 Specification will have unfortunate consequences for many households seeking to combine an energy rebate with their new, efficient appliance purchase. The Inflation Reduction Act (IRA) and many utility rebates across the country offer rebates specifically for ENERGY STAR covered categories and listed products; EPA’s proposed V1 Specification would block several energy efficient products from eligibility for those rebates. And worse, by default, eliminate radiant cooktops, or at best, significantly limit the choice of radiant cooktops – almost to the point of elimination from qualification for rebates. This seems to defeat the intent of the IRA and the Biden Administration’s focus on efficient electrification.

Our concern is supported by the data in the above graphic, taken from ENERGY STAR Stakeholder Webinar, which shows only three Smooth Electric, Non-Induction datapoints (seemingly) achieving the V1 Specification level of ≤ 190 kWh/y IAEC. However, as noted in above comments, these datapoints could actually fail to meet the Specification after accounting for test procedure variability (5.6 percent on electric products) or these will simply be reported (by the manufacturer) outside the specification limit in their account for the variability and to protect against a non-compliance verification. So when accounting for the inherent variability in the test procedure, no Smooth Electric, Non-Induction (radiant) datapoints would qualify for ENERGY STAR (and related rebates) at the V1 Specification level of ≤ 190 kWh/y IAEC and several of the Smooth Electric, Induction data points would also be eliminated for the same reason. BSH can't imagine ENERGY STAR means to propose a standard so stringent it effectively eliminates much of the market it means to cover.

At the proposed V1 Specification level, consumers would be better served in the IRA and other utility rebates if the ENERGY STAR V1 only covered induction cooktops rather than covering induction and radiant and then setting an overly stringent standard that only an extremely limited selection of electric cooktops could meet. This would be a great disservice to all consumers, and in particular, consumers with little or no discretionary income. Ideally, ENERGY STAR will simply adjust the proposed level to capture a more representative sampling of Smooth Electric appliances -accounting for the variability that is inherent in the test procedure. However, another plausible solution which could better serve consumers with energy efficient products would be to create separate Specifications - one for induction and one for radiant cooktops. This solution is further supported by the significant utility differences between radiant and induction cooking surfaces, albeit DOE and EPA have yet to acknowledge the utility.

In the ENERGY STAR Draft 1 Specification Stakeholder Comment Response Matrix, EPA remarks it does not intend to separate products into different product classes at this time and points to DOE's proposed standard not finding consumer utility difference. The DOE rulemaking is ongoing, so this matter has not yet been finally determined (further justifying EPA should wait to finalize its specification until DOE issues a final rule). Additionally, and perhaps most importantly, a review of on-line consumer and third-party reviews, to the contrary, highlight the many utility differences.

A brief website search of consumer reviews has this to say about the utility of induction cooking: (they) love the unbeatable temperature control induction cooktops offer; *the instant response means (they) don't need to move the pan off the burner – just turn down the temp. Induction cooktops cook food more quickly, adjust instantly to temperature changes, and take no time at all to cool down. Pans stay clean on the outside and the inside is much easier to clean also. Clean up could not be easier, and the surface can quickly transition to a serving area. Induction is ideal for multitasking and offers flexibility to use larger and non-round pans in the flex-zones. Connectivity with the app offers setup shortcuts...and so on.*

This limited sampling of consumer reviews highlights the delight and utility cooks experience with induction cooking. The distinctly unique capacity and performance-related features of induction cooking warrants separate product class specifications.

Finally, EPA should not underestimate the narrowing of consumer choice of energy efficient cooking products that will result from this specification.

In addition to the points raised in the above comments, consumers switching gas, coil or smooth electric cooktops must also plan for installation topics which could include any or all of the following: countertop cutout changes, wiring upgrades, breaker upgrades or entire panel upgrades to account for current building codes and the products themselves. Many homeowners with older electric cooktops are on 30Amps. Manufacturers, such as BSH, do offer a limited selection of 30Amp cooktops, however, many require 40Amps or more. BSH raises this point to stress how this V1 Specification can narrow consumer choice in and of itself but also when put through the filters of installation considerations and rebate program eligibility.

BSH supports ENERGY STAR in wanting to make it easy for consumers to save money and protect the environment. With the few suggested modifications as noted here, BSH believes this Specification can do more to achieve those goals. This is the very first ENERGY STAR Specification for Residential Electric Cooking Products, utilizing the very first DOE cooking tops test procedure, and considers DOE's on-going proposed energy conservation standards for consumer conventional cooking products. Consumers rely on ENERGY STAR to identify the top (roughly) 25% of the most efficient products; it would be a shame to set an overly restrictive standard on this first-ever specification.

Thank you for your consideration of these comments. I would be very happy to address any questions you may have.

Respectfully submitted,

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