

June 2, 2023

Ms. Tanja Crk  
US Environmental Protection Agency  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. Crk:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to ENERGY STAR® Version 1.0 Commercial Electric Cooktops Draft 2 Specification, released by the Environmental Protection Agency (EPA) on April 20, 2023.

CEE is the binational organization of energy efficiency program administrators. Historically, the CEE Board of Directors determined to build a single brand for efficiency and elected to create standing for the ENERGY STAR® Program rather than advancing the name recognition of CEE or other endeavors that existed at that time. The ENERGY STAR Program adopted specifications supported by CEE and program administrators, providing the confidence that utility ratepayer programs needed to invest in incentives in association with ENERGY STAR. This was a conscious investment and contribution of equity and the sanctioned obligations of utility members that include responsibility for delivering safe, reliable, and affordable service. Today, the staff and membership of the Consortium continue to perform diligence relative to the ENERGY STAR brand promise and associated performance specifications, given the very serious obligations entrusted to US and Canadian utilities as well as others sanctioned with advancement of voluntary market transformation efforts.

CEE members are responsible for ratepayer-funded efficiency programs in 38 US states, the District of Columbia, and four Canadian provinces. In 2020, CEE members directed approximately 63% of the \$8.5 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR, so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

## **Ensuring ENERGY STAR Test Methods Deliver Credible Results**

### **CEE Supports Requiring Each Hob on a Multihob Cooktop to Meet the Energy Criterion for the Unit to Qualify for ENERGY STAR**

CEE is grateful to EPA for addressing our comment to the Draft 1 proposal regarding possible risks associated with basing qualification on a weighted average of hob test results. The Draft 2 certification requirements, which necessitate that each hob or cooking zone on a multihob cooktop must meet the energy efficiency threshold for the cooktop to qualify, help mitigate potential risks identified in our comments to Draft 1. These include that the use of a weighted average of individual hob test results as the basis for ENERGY STAR qualification would create the possibility that a manufacturer could “game” qualification in the case of multihob cooktops of differ power rating. Regardless of intentional gaming by manufactures, allowing multihob cooktops with individual hobs below the specified efficiency level to qualify for the label creates a risk that the end user’s expectations of an ENERGY STAR product may not be met. We also conveyed that the weighted average approach could create challenges for program administrators to stand up program offers for ENERGY STAR cooktops if not all hobs meet the specification. The proposed change addresses the risks we identified. We support the change and thank EPA for responding to CEE’s concerns.

### **Limiting Test Cooking Container to Single Material May Not Reflect Real World Performance Conditions**

EPA has proposed that, for the purpose of ENERGY STAR Certification, all commercial electric cooktops test using a defined standard stainless steel cooking container. This deviates from the ASTM F1521-22 test standard, which specifies steel or steel-plated nickel for commercial induction and aluminum for commercial non-induction cooktops. We are concerned that there could be a discrepancy between testing conditions and potential real-world conditions if requiring conventional cooktops to test using a stainless-steel container produces a lower efficiency result than using an aluminum container, which is commonly used in practice. We encourage EPA to collect data on the energy use impact

of cooking material on conventional electric cooktops and evaluate if the proposed requirements are technology neutral.

## Proposed Energy Efficiency Levels Characterize Meaningful Savings in the Market

We support the proposed energy efficiency criterion of Cooking (Boil) Efficiency of at least 80% for the Version 1.0 Specification. While the pass rate of models in the *dataset* is well above the traditional 25% targeted for ENERGY STAR at almost 70%, CEE members with subject matter expertise indicate that a substantial portion of models currently available in the *market* and purchased by foodservice establishments are conventional cooktops that would not meet the proposed efficiency threshold. For this reason, we believe that the 80% level specified in Version 1.0 is an appropriate threshold to set for this category.

## Reporting Requirements for Voltage-Versatile Models Ensures Maximum Savings

EPA has proposed the following test requirement for units with voltage versatility:

For manufacturers/labs testing units with voltage versatility: Units shall be tested in worst-case scenario for energy efficiency, as specified by the manufacturer.

Since the labs may be running the tests at multiple voltages (if applicable), then the worst results must pass.

CEE supports EPA requiring that models with more than one possible operating voltage qualify based on their lowest operating efficiency voltage, i.e., worst case scenario. This requirement enhances confidence in ENERGY STAR labeled product performance, which is helpful for program administrators establishing program offers for cooktops and for ensuring that consumer expectations are met.

## The Draft 2 Dataset Represents a More Thorough Basis from Which to Assess the ENERGY STAR Proposal

We thank EPA for improvements to the dataset, both volume of model data and quality of data analysis, in response to CEE's comments on Draft 1. This includes increasing the number of models in the dataset from 14 to 33 as well as obtaining test data for four non-induction models. The presentation of the model test results also represents an improvement in clarity. Specifically, the Draft 2 Data Package uses only the average of

each model's three test runs (instead of each model's test runs and the average without distinction, as in Draft 1); this enabled our membership to conduct a more comprehensive review of the proposal.

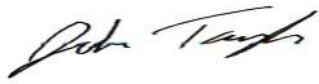
## **Inclusion of Commercial Electric Ranges Enables More Comprehensive Scope for Defining High Performance Equipment**

In Draft 2 EPA proposes to include commercial electric ranges in the scope of the specification. Specifically, EPA proposes that “A commercial electric range may be certified if the commercial electric cooktop portion of the unit meets the criteria set forth in this specification and the commercial electric oven portion is certified to the ENERGY STAR Commercial Ovens specification version currently in effect. Otherwise, an electric range may not be certified.” We support this approach to incorporating commercial electric ranges, as it helps protect brand integrity and ensures that consumer expectations for products that bear the ENERGY STAR label are met. Without this new inclusion, there could be a risk that when people buy a commercial electric range oven, the oven portion does not meet expectations for an ENERGY STAR oven, which is a separately labeled product. However, in the current ENERGY STAR Commercial Ovens Version 3.0 Specification range ovens are excluded per section 2.B.d. EPA should clarify how an electric range oven could qualify.

The CEE Commercial Kitchens Committee believes that there are few if any electric ranges that would be eligible for the current ENERGY STAR Commercial Ovens Version 3.0 Specification, which includes convection and combination ovens but not conventional ovens or range ovens. In the Committee's experience, commercial electric range ovens typically use conventional technology and are often used for warming plates, holding food temperature, or proofing rather than for cooking. We request that EPA provide data on electric range product availability and how range ovens are used in the foodservice market. If further information indicates that there are not commercial electric ranges that meet the ENERGY STAR Commercial Ovens Version 3.0 Specification criteria, and EPA identifies a market need for which supporting conventional oven technology would be appropriate, we encourage EPA to consider the development of a specification for commercial electric range ovens with conventional oven components.

CEE would once again like to thank the EPA for the opportunity to comment on the ENERGY STAR Commercial Electric Cooktops Version 1.0 Draft 2 Specification. Please contact CEE Senior Program Manager Bjorn Jensen at 617-337-9280 with any questions about these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Taylor". The signature is written in a cursive, flowing style.

John Taylor  
Executive Director