

December 22, 2022

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 Specification, released by the Environmental Protection Agency (EPA) on November 10, 2022.

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.

CEE Supports ENERGY STAR Efforts to Establish a Specification for Commercial Electric Cooktops

The CEE Commercial Kitchens Initiative aims to provide clear and credible definitions in the marketplace as to what constitutes highly efficient energy and water performance in cooking, refrigeration, and sanitation equipment, and then to help streamline the selection of products through targeted market strategies based upon the unique features of particular foodservice markets. The Initiative is designed to support member participants promoting a bundle of relevant program offerings in the foodservice market to achieve energy and water savings.

The ENERGY STAR Commercial Electric Cooktop Version 1 Discussion Guide released in February 2021 cites growth in the sales of commercial cooking equipment including cooktops over the last decade and stakeholder expectations for continued growth in the future. The Discussion Guide also reports that induction cooktops can be up to 90% efficient while providing enhanced amenity. Because induction technology works by heating the cookware rather than the cooktop, it reduces the risk for burns by the user. Induction technology also has several cooking precision benefits including precise temperature control, reduced heat up and cool down times, and faster temperature response times. Increased cooking efficiency has the benefit of reduced waste heat, likely leading to reduced air-conditioning loads during the cooling season and reduced ventilation rates.

CEE supports EPA's efforts to develop an ENERGY STAR specification for highly efficient commercial electric cooktops that provide incremental energy savings in applications where electric cooktops are used. CEE also supports EPA's intent to set the efficiency threshold at a level that is inclusive of top performing equipment regardless of technology, meaning top performing conventional commercial electric, i.e., electric resistance, cooktops may meet the performance threshold.

The Use of a Weighted Average of Individual Hob Test Results Creates Risks of Manufacturer Gaming and Compromise of End User Performance Expectations

EPA proposes to use ASTM F1521-12 (2022) *Standard Test Methods for Performance of Range Tops* as the basis for testing cooktop equipment performance to qualify for the ENERGY STAR Commercial Electric Cooktop Specification. The draft Specification includes the following note:

“The ASTM F1521-12 (2022) test method indicates to start the test on the hob (or cooking unit/zone) closest to front and left (Section 10.4.2), then to repeat the test for each type of hob (or cooking unit/zone) on the range top (Section 10.4.11). The intent of the method is to test each hob individually. ENERGY STAR would take a weighted average of all hobs on the cooktop to determine certification.”

Basing the weighting on hob power creates the possibility that manufacturers could “game” qualification in the case of multihob cooktops with hobs of different power ratings. A common four-hob cooktop design is two-and-two, meaning that two hobs are low-power and two hobs are high-power. Theoretically, a product with high-efficiency high-power hobs and low-efficiency low-power hobs could meet the specification depending on the weights used in the weighted average. 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. It could also create challenges for program administrators to stand up program offers for ENERGY STAR cooktops if not all hobs meet the specification.

CEE requests additional information from ENERGY STAR on how weighting would be used and what steps EPA would take to ensure that certified products would meet the expectations of ENERGY STAR.

CEE Encourages EPA to Collect Test Data on More Models Before Finalizing the Specification

The EPA dataset includes 56 data points representing 14 models, all of which were induction cooktops. 41 of the data points meet the proposed 80% boiling efficiency for a pass rate of 73%. We understand that EPA proposed the energy efficiency criterion with the intent to identify top performing electric models inclusive of conventional technology

and provide a selection of models offered by multiple manufacturers, and is allowing such a high pass rate because the dataset is limited to a relatively small number of models and only induction technology. CEE is concerned that such a limited dataset may not provide a sufficient basis on which to establish a new ENERGY STAR specification, and strongly encourages EPA to collect test data from additional models before finalizing the specification.

Request for Clarity on Model Test Result Methodology

EPA staff explained on the November 30th stakeholder webinar that each cooktop model in the dataset was tested three times and the average of the three test results was included as a fourth data point for each model. Given that there is some small variation in a model's results from test run to test run, it is reasonable to conduct multiple test runs to better understand the range of expected performance. The average is also helpful to characterize expected performance. However, CEE is not clear on why it is appropriate to combine the average of the three test results with the actual test results in the dataset without distinction and requests that EPA explain what value this approach provides.

CEE would once again like to thank the EPA for the opportunity to comment on the ENERGY STAR Version 1.0 Commercial Electric Cooktops Draft 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".

John Taylor
Deputy Director