

ENERGY STAR® Version 1.0 Residential Cooking Products Draft 1 Specification Stakeholder Comment Response Matrix

Topics	Stakeholder Comment	EPA Response
Creation of Specification	<p>The majority of stakeholders are in support of the creation of this residential cooking products specification. Over 60% of U.S homes contain electric cooking products so the demand for introducing ENERGY STAR labeling to this field will fill an important gap. They support the technology neutral approach to determining the energy consumption level for ENERGY STAR. This specification will add value and provide market direction at a critical time.</p>	<p>EPA appreciates the support for the ENERGY STAR Draft 1 Residential Cooking Products specification. EPA acknowledges the request the Agency received to make the draft more stringent. EPA has proposed a level that delivers savings while still allowing for recognition of the most efficient of lower cost units.</p>
Scope	<p>One stakeholder raised a concern that the tested products are not an accurate representation of products on the market and recommended EPA wait for additional data to move forward. The stakeholder also stated that low-power mode energy accounts for product safety and health features affecting indoor air quality concerns, and that limiting the energy consumed during standby may negatively affect these features. Further, this stakeholder indicated that radiant technologies have the lowest qualification rate in the specification data set. The stakeholder recommended the levels are adjusted to include more radiant cooking tops.</p> <p>Another stakeholder had concerns regarding the overall availability of products that align with the scope of the Draft 1 specification and also proposed that oven low-power mode energy be removed.</p>	<p>EPA realizes that with a new product specification, data will initially be limited but is confident in the available test data to justify the proposed levels that are inclusive of coil, radiant, and induction technologies.</p> <p>EPA believes that the low-power mode energy, the $E_{TLP,O}$ level, is necessary to ensure the low power energy consumption from the oven has a backstop. To offer the ENERGY STAR on ranges, it is important to set and ensure products meet an efficiency requirement applicable to the oven portion of the range. The low-power mode energy criteria does so.</p>
Scope: Product Classes	<p>One stakeholder stated induction cooking tops should be considered a separate product class due to several consumer utility differences between induction and electric resistance products, but ultimately wants the ENERGY STAR product classes to be aligned with the DOE product classes.</p>	<p>DOE has proposed separate product classes for coil and smooth electric cooking tops and has not found a consumer utility difference between induction and other electric smooth cooking tops. Given the limited differentiation of coil products and for simplicity, EPA intends to not separate products into different product classes at this time.</p>

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Savings & Payback	<p>Four stakeholders request EPA provide a savings and payback analysis with the release of the next draft of the cooking products specification, so the specification is shown to be cost effective to consumers. A couple stakeholders stated EPA needs to ensure that consumers from low-income households and other disadvantaged communities are able to have a reasonable payback period to increase trust in the ENERGY STAR brand. Furthermore, considering the upcoming IRA home rebates, stakeholders emphasized the importance of establishing clear cooking products cost-effectiveness before rebate programs launch. One commenter anticipates low savings from qualifying electric cooking products and proposes that EPA consider greenhouse gas emission reductions in addition to energy and cost savings. This commenter also encourages EPA to provide a more detailed characterization of the data used to calculate savings including number of units per product type and diversity of manufacturers represented. The commenter compares the draft 1 proposed level (IAEC = 190 kWh/year) with the ENERGY STAR Emerging Technology Award for induction cooking tops level (IAEC = 125 kWh/year) expressing concern that the residential cooking product specification is not stringent enough.</p>	<p>EPA appreciates these comments and provides further information on savings, greenhouse gas emissions reductions, and payback with the release of draft 2. EPA provides the requested characterization of the available dataset in the ENERGY STAR residential cooking products Draft 2 Data Package.</p> <p>The ENERGY STAR Emerging Technology Award for induction cooking tops was developed using an earlier version of the DOE test procedure which differs from the current DOE test method referenced in this product specification. The results from the test procedures used for ETA and the Draft 1 specification are not comparable. Stakeholders and partners are encouraged to provide additional data to support the ENERGY STAR Residential Cooking Products specification development.</p>
Test Procedure	<p>Three stakeholders have expressed concern for the use of the DOE test procedure for the qualification of products to the standard set by the ENERGY STAR Residential Cooking Products Specification Draft 1. The concerns are related to test result repeatability. Additionally, there is concern that variation in measured energy efficiency of the cooking products implies the test procedure will be unable to differentiate products within a tight range of energy consumption.</p>	<p>EPA appreciates these comments and directs stakeholders with any test procedure related questions or concerns to DOE.</p>

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Additional Requirements	<p>Commenters expressed support for the reporting requirements proposed in draft 1:</p> <ul style="list-style-type: none"> • Total number of cooking zones in the cooking top, the maximum input rate of each cooking zone, and the cooking top type <p>Two commenters disagreed on inclusion of the time to near-boil (i.e., t_{90}).</p> <p>Four stakeholders have expressed interest in the following additional reporting requirements for the ENERGY STAR Residential Cooking Products Specification.</p> <ul style="list-style-type: none"> • Low power mode for standalone cooking tops. • Whether a unit is portable • Whether or not the induction unit has active cooling after turning off; and if so to include cooling duration. • Connected product criteria highlighting several connected features. 	<p>One goal of the specification is to assist customers in making simple energy-efficient purchasing decisions. Acknowledging different consumer features for cooking products, EPA can help inform consumers with a few additional reporting requirements with limited burden to manufacturers.</p> <p>EPA reminds commenters that the low power mode energy use for cooking tops is captured by the IAEC and need not be a separate criterion. However, the low power mode energy use for cooking tops is proposed as a reporting requirement only at this time.</p> <p>EPA maintains the inclusion of the time to near-boil (i.e., t_{90}) as a reporting requirement. This measurement is a part of the DOE test procedure and not an additional burden for ENERGY STAR certification. The Agency recognizes that individual consumer usage of a cooking top may vary, but the DOE test procedure was determined to be representative of an average use cycle. Therefore, EPA believes that t_{90} is the appropriate metric to report.</p> <p>EPA seeks further comment on the proposal to include connected product criteria.</p>

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Timeline	One stakeholder is in support of the specification moving forward for a speedy final publication with the draft 1 proposed efficiency level and further monitoring of the DOE standard. Two stakeholders have expressed concerns for the timeline of the Version 1.0 specification with one stakeholder who wanted a further extension of the Draft 1 comment period and for the specification process to be delayed until DOE issues a final rule in its energy conservation standards rulemaking. A couple of commenters suggest effective dates for the specification including late Q3 2023 and no earlier than 2024.	EPA appreciates all comments regarding the timeline of this specification. EPA will continue to work with DOE and track the federal standards for consumer conventional cooking products as well as the guidance for the implementation of rebates and tax credits under the Inflation Reduction Act.
Consumer Education	One stakeholder encourages EPA to play an active role in supporting the education of consumers about high-performance electric cooking.	EPA appreciates this comment and plans to provide educational materials for consumers after the specification is final.