

ENERGY STAR® Version 1.0 Residential Electric Cooking Products Draft 2 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. They support the technology neutral approach to determining the energy consumption level for ENERGY STAR. This specification will provide market direction at a critical time and believe EPA effectively communicated the possible savings.</p>	<p>EPA is grateful for the support stakeholders expressed for the ENERGY STAR Version 1 Residential Cooking Products specification.</p>
Scope	<p>One stakeholder raised a concern that the tested products are not an accurate representation of products on the market with a bias towards induction products. The stakeholder also stated that radiant technologies have the lowest qualification rate in the specification data set and recommended the levels be adjusted to include more radiant cooktops. This commenter notes that single unit testing used for this initial dataset may not reflect sampling requirements defined by DOE in 10 CFR § 429.23 for cooking products.</p> <p>Another stakeholder had concerns regarding the drawbacks to an all-electric cooking specification due to the burden that electrification and other upgrades may place on the consumer. Another stakeholder suggested the ENERGY STAR specification may be better served if only induction products were eligible or if it included separate criteria for induction and radiant technology.</p>	<p>EPA realizes that with a new product specification, data will initially be limited but is confident in available test data to justify the proposed levels. EPA considered the dataset when developing the proposed levels. When EPA develops a Version 2 specification in the future, the Agency will be able to leverage the ENERGY STAR Qualified Products List and CCMS.</p> <p>The residential electric cooking products specification is not exclusive to induction, but more induction cooking products meet the proposed levels. The EPA recognizes that installations for induction and other electric cooking technologies may require retrofits and anticipates at least some of the burden to be alleviated through tax credits and state rebates offered through the Inflation Reduction Act provisions.</p>
Specification Criteria	<p>One commenter expressed concern about limited product testing of coil cooktops with oil ignition prevention features and about the proposed levels impacting possible product health and safety features that may consume standby power.</p>	<p>EPA acknowledges the limited number of coil cooktops in its dataset, but notes that it contains at least one coil cooktop with oil ignition prevention features meeting the specified level. EPA understands that there is a variety of both smooth and coil cooktops on the market with efficiencies at and above the proposed levels indicating that the levels can be met without compromising health and safety features.</p>

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	<p>This commenter further suggests that there is no differentiation for oven low-power mode energy consumption with the transition to switch-mode power supplies and as such is considered a reporting burden and unnecessary expense.</p> <p>Several stakeholders brought up certification and verification sampling plans citing to the ENERGY STAR Directive No. 2011-04. One stakeholder encourages EPA to implement a verification program for electric cooking products and to work with AHAM.</p>	<p>The reporting burden for low-power mode energy consumption is expected to be minimal because it is a calculation derived from measured data.</p> <p>Per Section 4 (Test Requirements) of the ENERGY STAR Version 1.0 Residential Electric Cooking Products draft specification, sampling plans for certification may follow one of two tracks: 1) a single model is tested; or, 2) testing is performed per sampling requirements defined in 10 CFR § 429.23 for cooking products. EPA recognizes that most partners will opt to test for ENERGY STAR certification that is consistent with the DOE sampling plan. In order to address concerns about testing burden, EPA allows for the single sample option. Products will be subject to the same verification testing as all other ENERGY STAR products. EPA plans to recognize certification bodies to certify and verify residential electric cooking products as long as their programs meet the conditions and criteria for recognition. AHAM currently provides verification testing across a range of ENERGY STAR products and would need to provide documentation on a new program for residential electric cooking products if they wish to expand to this product category. EPA anticipates verification testing to begin no sooner than 2025 allowing ample time for verification testing program development.</p>
<p>Product Classes</p>	<p>One stakeholder stated support for the one product class presented in the Residential Cooking Tops Draft 2 Specification.</p>	<p>EPA appreciates these comments and is grateful for the support.</p>

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	<p>Another stakeholder suggested EPA have separate product classes for induction and radiant.</p>	<p>EPA typically only includes additional product classes if there is substantial consumer utility. Here, introducing a new product class for radiant, would not provide a significant consumer utility from the other smooth electric products.</p>
<p>Additional Requirements</p>	<p>One stakeholder has shown support for all the additional reporting criteria as proposed. Two stakeholders have expressed interest in the following additional requirements:</p> <ul style="list-style-type: none"> • Whether a unit is portable, • Whether a unit has active cooling, with duration after unit turned off, • The number of tested cooking zones in the cooktop, and total number of cooking zones tested. The distinction between these items may inform consumers about specialty cooking zones and that they are not included in energy efficiency testing. • Additional reporting of smart product criteria highlighting several smart features including the following: Wi-Fi connectivity, energy usage reporting, status notifications, cooking progress monitoring for conventional ranges, and remote oven control for conventional ranges. 	<p>The goal of the specification is to assist customers in making energy-efficient purchasing decisions. Acknowledging different consumer features for cooking products, EPA can help inform consumers to choose the efficient product that best meets their needs.</p> <p>In the Final Draft, EPA includes reporting requirements on unit portability, active mode cooling feature, and total number of cooking zones. Reporting on smart features is optional and specialty feature reporting may also be included. Further, a test procedure to capture the active cooling duration is not available at this time.</p>
<p>Savings & Payback</p>	<p>One stakeholder writes that the Draft 2 proposed levels limit the range of products and price points available to consumers eligible for the IRA. The commenter states that the electric smooth cooktops EL 2 level proposed by DOE [for the purposes of federal standards] yields a net loss for 30% of low-income households and that EPA must justify low savings to consumers.</p>	<p>EPA appreciates these comments and believes the specification will allow consumers considerable rebates through the Inflation Reduction Act. The Final Draft adjustment to the proposed level from 190 to 195 kWh/year will effectively expand the selection of residential electric cooking products eligible for certification, making certification achievable for more lower cost products, and subsequently alter the savings picture (see Final Draft Data Package). EPA estimates the proposed ENERGY STAR efficiency level is 18% more efficient in annual energy consumption, electricity costs, and emissions, compared to</p>

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		<p>a weighted baseline efficiency level using DOE's market share estimates for smooth and coil electric product types. The EPA recognizes that installations for induction and other electric cooking technologies may require retrofits and anticipates at least some of the burden to be alleviated through tax credits and state rebates offered through the Inflation Reduction Act provisions.</p>
<p>Test Procedure</p>	<p>Stakeholders provided mixed feedback on the DOE test procedure. One set of stakeholders support the test procedure indicating it is adequately repeatable and reproducible. While others expressed concern about product availability beyond induction and high variation under the current test procedure. One stakeholder expressed concern that the DOE test procedure may produce misleading (overstated or understated) values for the combined low-power mode energy consumption for the oven portion of ranges.</p> <p>One stakeholder urges EPA to create a verification testing program prior to the effective date due to reproducibility concerns on the test procedure.</p> <p>Further, stakeholders recommend coordination with Natural Resources Canada on the ENERGY STAR specification launch due to differences with the test procedures for cooking products in the U.S. and Canada.</p>	<p>EPA appreciates these comments and directs stakeholders with any test procedure related questions/concerns to DOE. DOE has determined that appendix I1 is repeatable and reproducible, and determined that the apportioning of the low-power mode energy use to the oven component of ranges produces a representative value of combined low-power mode energy consumption.</p> <p>The verification testing response is provided in the specification criteria section of this comment matrix (see above).</p> <p>The ENERGY STAR specification is the same in the U.S. and Canada and will launch on the same date. Thus, EPA and NRCAN are fully aligned on the ENERGY STAR specification.</p> <p>According to the EPA's ENERGY STAR program guiding principles, the EPA generally relies on test procedures developed and maintained by the U.S. Department of Energy (DOE). When available, DOE's regulations and test procedures form the basis of EPA assessments of product category viability, criteria development, and energy performance metrics. The DOE test procedure (10 CFR 430, Subpart B, Appendix I1 – Uniform Test Method for</p>

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		<p>Measuring the Energy Consumption of Conventional Cooking Products) final rule was published August 22, 2022. Therefore, EPA has proposed ENERGY STAR criteria based on the DOE test procedure. The NRCan test procedure (CSA C358-03 (2022) – Energy Consumption Test Methods for Household Electric Ranges) was published in 2003. The EPA acknowledges that these test procedures differ and understands that NRCan’s intent is to align as much as possible with the DOE regulations once NRCan undergoes its own regulatory process, consistent with the 2021 Memorandum of Understanding Concerning Cooperation on Energy (see Section 2.a.v.) between NRCan and DOE.</p>
<p>Timeline</p>	<p>Stakeholders provided mixed feedback on the finalization date of the specification. One set of stakeholders support prompt finalization in 2023. Others have expressed concerns with the current timeline to finalize this specification and propose a delayed approach. They indicate that lab capabilities and test burden associated with the DOE test procedure need to be considered including any potential revisions to the test procedure or federal standard following evaluation of the industry petition for rulemaking (88 FR 24133, Docket Number EERE-2023-BT-TP-0006-0003, published April 19, 2023). One stakeholder has suggested an effective date no sooner than January 1st, 2024 to provide additional time for manufacturers similar to the nine month transition period for spec revisions, while another stakeholder has suggested delaying publication until DOE issues a final rule.</p>	<p>EPA appreciates all comments regarding the timeline of this specification and aims to move forward with prompt finalization in 2023. The DOE test procedure has been publicly available since August 22, 2022, enabling labs to prepare for testing. This test procedure has also been required for use in making representations of cooking top energy use since February 20, 2023. Should this test method be updated, EPA will align with the latest version.</p> <p>Nine months are allotted for transitions to new versions of existing specifications to allow for the transition of product labeling and collateral materials. Partners are invited to certify to this new specification as soon as they are ready.</p>