ENERGY STAR® Version 1.0 Commercial Electric Cooktops Draft 2 Specification Stakeholder Comment Response Matrix

Topics	Stakeholder Comment	EPA Response
Scope	One commentor supports the Draft 2 proposed scope expansion to include commercial electric ranges, but is concerned that few, if any, available models in this classification of cooktops would meet the ENERGY STAR Commercial Oven Version 3.0 specification, as proposed in the Commercial Electric Cooktops Draft 2 specification. This is mainly because the oven portion of commercial electric ranges are typically conventional ovens, which are not currently eligible for ENERGY STAR certification. The stakeholder requests EPA consider conducting further research on the commercial electric range technologies available in the market and consider expanding the ENERGY STAR Commercial Ovens Version 3.0 specification's scope to include conventional ovens, as this may open up opportunities for eligible commercial electric ranges.	EPA appreciates the support of the scope expansion to include commercial electric ranges in the Commercial Electric Cooktops Version 1.0 Draft 2 specification. While EPA intends to maintain the proposed scope expansion to include commercial electric ranges in the Version 1.0 specification, the Agency agrees that most commercial electric ranges available in the market include a conventional oven, thus preventing eligibility for ENERGY STAR certification at this time. However, EPA also identified eligible electric ranges that are currently available in the market. EPA will continue to monitor the market and product availability; and will consider the possibility of expanding scope to include conventional ovens in the next iteration of the ENERGY STAR Commercial Ovens specification.
Certification Criteria	In Draft 2, EPA proposed that each individual hob's energy efficiency performance must meet the minimum criterion (80%) for ENERGY STAR certification, rather than taking a weighted average approach. Stakeholders expressed support for EPA's Draft 2 proposal to shift from a weighted average approach.	EPA appreciates support for the Draft 2 Version 1.0 commercial electric cooktops energy performance criterion and approach to require all individual hobs to meet it.
Cookware	Stakeholders expressed concerns with the Draft 2 cookware deviation from the ASTM F1521-22 Standard Test Methods for Performance of Range Tops – i.e., steel or steel-plated nickel for induction units and aluminum for non-induction units. Stakeholders would like to see further justification for selecting stainless steel in testing induction and non-induction models such as a demonstration that one pot material or size will have negligible effects on efficiency results. Indeed, one stakeholder provided	EPA appreciates the stakeholder conducting sensitivity testing on a commercially available electric cooktop and sharing the results to further help inform the ENERGY STAR specification development effort. While the Agency continues to encourage additional testing with varying cookware materials on commercial electric cooktops, EPA maintains that for this Version 1.0 specification, a standard material shall be used as the test cookware for ENERGY STAR certification and verification.

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	additional cookware sensitivity testing per ASTM F1521-22 methodology to illustrate how the cookware material and size can influence the cooking energy efficiency results.	
Reporting Requirements	Stakeholders agree with multiple proposed reporting requirements including for models with voltage versatility to ensure an eligible model would pass the ENERGY STAR minimum efficiency threshold in a "worst-case" scenario, total number of hobs on the cooktop, the maximum electrical energy input rate of each hob, and the simmer test results.	EPA appreciates support for the Draft 2 Version 1.0 commercial electric cooktops reporting requirements.