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ENERGY STAR Program Requirements for Residential Cooking Products, Draft 1, Version 1.0

Ms. Crk:

On behalf of NRDC (Natural Resources Defense Council), and our more than 3 million members and online activists, I am pleased to offer the following comments on ENERGY STAR's proposed requirements for residential electric cooking products, draft 1, version 1.0.

We strongly support establishing a specification for electric cooking products. As the Environmental Protection Agency (EPA) acknowledged in the letter accompanying this draft, approximately 60% of U.S. homes contain an electric cooking product.¹ By establishing a specification for such a widely used product for the first time, EPA is filling an important gap. There are meaningful differences in energy consumption for these products, and this specification can help consumers make better, more informed decisions regarding energy efficiency. However, we believe that this draft could be strengthened.

We urge EPA to set a higher threshold for ENERGY STAR qualification. In this draft, EPA has proposed that products have a rated Integrated Annual Energy Consumption (IAEC) threshold of less than or equal to 190 kWh/yr in order to qualify. In a separate proceeding, the Department of Energy (DOE) analyzed possible minimum energy efficiency standards for these same products, analyzing limits as low as 179 kWh/yr.² While DOE did not ultimately select this level for a new standard, that DOE analyzed a level substantially below what EPA is proposing for ENERGY STAR suggests that EPA's draft may not be sufficiently aggressive. We strongly encourage a level more stringent than 190 kWh/yr.

Conclusion. We are grateful for the opportunity to comment on this important specification and look forward to continuing to work together to improve the energy efficiency of these products. We thank you for your consideration of these comments.

Sincerely,



Joe Vukovich
Staff attorney, NRDC

¹ <https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Cooking%20Products%20Version%201.0%20Draft%201%20Specification.pdf>.

² 88 Fed. Reg. at 6870.