



NYSERDA

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Ms. Tanja Crk, Product Manager
ENERGY STAR for Commercial Food Service
United States Environmental Protection Agency (EPA)
Washington, DC 20460

NYSERDA Comments on Draft 1 of ENERGY STAR Version 1.0 Residential Electric Cooktop specification

Dear Ms. Crk:

The following comments are submitted on behalf of the New York State Energy Research and Development Authority (NYSERDA). NYSERDA is a public benefit corporation and offers information and analysis, innovative programs, technical expertise, and support to help New Yorkers increase energy efficiency, save money, use renewable energy, and reduce reliance on fossil fuels. NYSERDA’s mission is to advance clean energy innovation and investments to combat climate change, improving the health, resiliency, and prosperity of New Yorkers and delivering benefits equitably to all. NYSERDA works to help implement New York State’s nation-leading climate agenda, which is the most aggressive climate and clean energy initiative in the nation; New York is advancing an orderly and just transition to clean energy that creates jobs and continues fostering a green economy as our communities continue recovering from the COVID-19 pandemic.

As NYSERDA supports the greenhouse gas emissions reduction mandates established by the Community Leadership and Climate Protection Act (Climate Act),¹ we look to the Environmental Protection Agency (EPA)’s leadership in advancing energy efficiency and decarbonization for consumer products. NYSERDA applauds the ENERGY STAR program for proposing this new specification for residential electric cooktops. We respectfully submit these comments for your consideration.

NYSERDA thanks EPA for establishing a new specification and supports adding additional reporting requirements

NYSERDA strongly supports EPA’s actions in establishing a new ENERGY STAR specification for residential electric cooktops. This specification will provide market direction at a critical time as consumers seek to decarbonize their kitchens; for consumers looking to purchase electric cooktops, ENERGY STAR recognition of high performing units will provide significant value.

NYSERDA recognizes the inherent challenge of establishing an efficient level for an initial V1.0 specification that appropriately draws the line between higher and lower performing products before there is an established product list

¹ <https://climate.ny.gov/>

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to indicate the range of market efficiencies. With the residential electric cooktop V1.0 specification, NYSERDA encourages EPA to move quickly to finalize a specification that can capture high performing induction products and differentiates the efficiencies of flat top or coil electric equipment. Over time, as more products are tested and efficiency design improvements are implemented to earn ENERGY STAR certification, EPA will gain a better understanding of the full market efficiency distribution and can pursue establishing more stringent efficiency criteria in line with the ENERGY STAR guidance principles.² NYSERDA has found the initial proposed efficiency level appropriate for the needs of the market at this time.

NYSERDA recommends adding the following reporting requirements to this specification, provided doing so does not slow down the timeline for publication:

1. Indication of if the unit is portable.
2. A reporting requirement for the low power mode for standalone cooking tops so the information collected could be used for future specification or standard developments.
3. 'Yes or no' if an induction unit has active cooling after the burners are turned off and if yes, how long does this mode stay on.

These three reporting requirements would present minimal manufacturer burden, however this information would be valuable for consumers as well as for states and programs that will refer to the ENERGY STAR list in years to come.

NYSERDA encourages EPA to promptly publish this V1.0 specification and monitor federal standards

NYSERDA encourages EPA to finalize this specification as soon as possible to allow products to begin to gain recognition immediately, which we anticipate will encourage consumers to adopt high efficiency electric cooktops in New York and beyond. The ongoing Department of Energy (DOE) rulemaking on Consumer Conventional Cooking Products Standards³ may result in a final federal standard with efficiency levels that are similar to the proposed EPA V1.0 Integrated Annual Energy Consumption (IAEC) levels. Once the DOE final rule is published, we recommend EPA be prepared to update the residential cooktop specification well ahead of the effective date for the federal standard.

Thank you for the opportunity to provide comments on the proposed Version 1.0 Draft 1 residential cooktop specification. NYSERDA seeks to be a strong partner of EPA as we work together to advance state and national decarbonization priorities. Please do not hesitate to reach out to discuss these matters further.

Sincerely,



Chris Corcoran
Team Lead – Codes, Products, & Standards

² The Guidance Principals establish that EPA will seek to capture the top 25% of the market:

https://www.energystar.gov/sites/default/files/asset/document/ENERGY_STAR_Strategic_Vision_and_Guiding_Principles.pdf

³ https://www1.eere.energy.gov/buildings/appliance_standards/standards.aspx?productid=34

