

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Consumer Federation of America
Consumer Reports
Earthjustice
National Consumer Law Center, on behalf of its low-income clients
Natural Resources Defense Council
Northwest Energy Efficiency Alliance
Pacific Gas and Electric Company

June 3, 2024

Dr. Carl Shapiro
U.S. Department of Energy
Office of General Counsel, EE-5B
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE-2014-BT-STD-0005/RIN 1904-AF57: Direct Final Rule for Energy Conservation Standards for Consumer Conventional Cooking Products

Dear Dr. Shapiro:

The Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), Consumer Federation of America (CFA), Consumer Reports (CR), Earthjustice, National Consumer Law Center, on behalf of its low-income clients (NCLC), Natural Resources Defense Council (NRDC), the Northwest Energy Efficiency Alliance (NEEA), and the Pacific Gas and Electric Company (PG&E) write to provide our strong support for the U.S. Department of Energy's (DOE's) Direct Final Rule (DFR) establishing amended energy conservation standards for consumer conventional cooking products. 89 Fed. Reg. 11434 (February 14, 2024).

Our organizations include consumer advocates, efficiency and environmental advocates, and a utility; we have worked for decades advocating for efficiency standards that provide large savings for consumers and significant cuts in carbon dioxide and other air pollutant emissions. Our coalition includes organizations that are leaders in testing appliances; conducting field studies on appliance energy use; evaluating emerging technologies; developing and implementing programs to increase the market share of efficient products; analyzing the impacts of improved efficiency standards; and producing the energy powering appliances. Our coalition also includes leading environmental groups and organizations that advocate for consumers and, in particular, low-income consumers.

We strongly support the standards in the DFR. The standards in the DFR reflect the joint recommendation that we submitted to DOE in September 2023 with the Association of Home Appliance Manufacturers (AHAM),¹ which was supported by States and additional utilities.² The standards for

¹ <https://www.regulations.gov/comment/EERE-2014-BT-STD-0005-12811>.

² See Docket No. EERE-2017-BT-STD-0003-0104 (supporting statement from the New York State Energy Research and Development Authority, California Energy Commission, and Massachusetts Department of Energy Resources,

cooking products were part of a package of recommendations for six products (refrigerators/freezers, miscellaneous refrigeration products, residential clothes washers, clothes dryers, dishwashers, and cooking products). We appreciate that DOE has published DFRs consistent with our joint recommendation for all six products.

The standards for cooking tops, which are the first efficiency performance standards for these products, will ensure that both electric and gas cooking tops meet a minimum level of efficiency. The standards will cost-effectively reduce energy use by 17% and 7% for electric smooth-top and gas cooking tops, respectively, relative to the least efficient products on the market today,³ while maintaining product features and functionality desired by consumers. For electric and gas ovens, the standards will ensure that products aren't unnecessarily wasting energy when they are not being used.

We do not expect the standards in the DFR to have any impact on product reliability. The standards in the DFR can be met with simple design changes that have already been incorporated in many models on the market today. For electric smooth-top cooking tops, the standard can be met by reducing standby power consumption when the cooktop is not being used. For gas cooking tops that do not already meet the new standards, their efficiency can be improved by optimizing burner and grate design. And for both electric and gas ovens, the standards can be met using a switch-mode power supply, which are commonly used in a wide range of appliances such as washers, dryers, and dishwashers. Therefore, we do not expect the standards to have any impact on product reliability.

We encourage DOE to promptly update the cooking products test procedures to reflect our joint recommendations with AHAM. As part of our September 2023 joint recommendation, we urged DOE to adopt the calculation method AHAM proposed in its 2023 petition to DOE for the simmer portion of the cooktop test procedure as an alternative to the full simmer test and, for enforcement purposes, to rely on the full simmer test in Appendix I1 to Subpart B of Part 430. In our January 2024 joint comments on the notification of petition for rulemaking, we expanded on these recommendations and provided additional recommendations to provide clarity on the test procedure.⁴ We encourage DOE to promptly adopt these recommendations.

Sincerely,



Joanna Mauer
Deputy Director
Appliance Standards Awareness Project

*On behalf of—
American Council for an Energy-Efficient Economy
Consumer Federation of America*

dated October 5, 2023); Docket No. EERE-2017-BT-STD-0003-0107 (supporting statement from San Diego Gas and Electric and Southern California Edison, dated October 17, 2023).

³ 89 Fed. Reg. 11459; Table IV.9. 89 Fed. Reg. 11463; Table IV.12. The adopted standard levels are equivalent to Efficiency Level (EL) 1.

⁴ <https://www.regulations.gov/comment/EERE-2023-BT-TP-0006-0013>.

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