

Appliance Standards Awareness Project  
Alliance to Save Energy  
American Council for an Energy-Efficient Economy  
Consumer Federation of America  
Consumers Union  
National Consumer Law Center  
Natural Resources Defense Council  
Northwest Energy Efficiency Alliance

September 9, 2015

Ms. Brenda Edwards  
U.S. Department of Energy  
Building Technologies Program  
1000 Independence Avenue, SW  
Mailstop EE-2J  
Washington, DC 20585

**RE: Docket Number EERE–2014–BT–STD– 0005/RIN 1904–AD15: Notice of Proposed Rulemaking for Energy Conservation Standards for Residential Conventional Ovens**

Dear Ms. Edwards:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Alliance to Save Energy (ASE), American Council for an Energy-Efficient Economy (ACEEE), Consumer Federation of America (CFA), Consumers Union (CU), National Consumer Law Center (NCLC), Natural Resources Defense Council (NRDC), and Northwest Energy Efficiency Alliance (NEEA) on the notice of proposed rulemaking (NOPR) for energy conservation standards for residential conventional ovens. 80 Fed. Reg. 33030 (June 10, 2015). We appreciate the opportunity to provide input to the Department.

**Based on DOE’s analysis for the NOPR, we support the proposed standards for residential conventional ovens.** DOE has proposed strong standards for residential conventional ovens, which would be the first national performance standards for ovens in the US. DOE estimates that the proposed standards would save 0.71 quads of energy over 30 years of sales and yield net present value (NPV) savings of \$4.7-11.0 billion for consumers. Life-cycle cost (LCC) savings for purchasers are about \$15 for electric ovens and almost \$300 for gas ovens.<sup>1</sup> The proposed standards could be met using well-established design options including switch-mode power supplies, improved insulation, reduced vent rates (electric ovens), electronic spark ignition (gas ovens), and improved burner and cavity design (gas ovens).<sup>2</sup>

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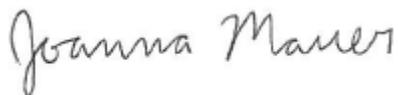
<sup>1</sup> 80 Fed. Reg. 33032.

<sup>2</sup> 80 Fed. Reg. 33052. EL 3 for electric standard, EL 1 for electric self-clean, EL 4 for gas standard, and EL 2 for gas self-clean.

**We agree with DOE’s determination that “commercial-style” gas ovens do not provide any unique utility.** As part of the Department’s analysis for the NOPR, DOE determined that “commercial-style” gas ovens, which typically have higher burner input rates, do not provide any unique consumer utility. In particular, DOE concluded that “there is no unique utility associated with faster cook times that is provided by gas ovens with burner input rates greater than 22,500 Btu/h.” In fact, DOE found that two of the three units in the Department’s test sample with the higher burner input rates actually took longer than the average time to heat the test load.<sup>3</sup> *Consumer Reports* similarly found in their tests that “higher Btu hasn’t guaranteed faster heating.” *Consumer Reports* also found that “pro-style ranges are big on style, but aren’t the best ranges” and that “even regular ranges now have beefy knobs, rugged grates, and stainless trim for a lot less money.”<sup>4</sup> Therefore, we support DOE’s decision not to establish a separate product class for gas ovens with higher burner input rates.

Thank you for considering these comments.

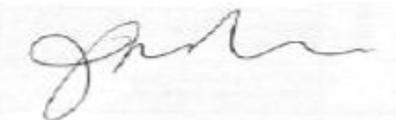
Sincerely,



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Appliance Standards Awareness Project



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Shannon Baker-Branstetter  
Policy Counsel, Energy and Environment  
Consumers Union



Charles Harak, Esq.  
National Consumer Law Center  
(On behalf of its low-income clients)

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<sup>3</sup> 80 Fed. Reg. 33045.

<sup>4</sup> <http://www.consumerreports.org/cro/ranges/buying-guide.htm>.



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