

# Appliance Standards Certification Rule Makes Technical Updates Without Affecting Efficiency Requirements

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*In October 2024, the U.S. Department of Energy (DOE) published a final rule that made technical updates to the certification requirements for a range of products subject to efficiency standards. Some members of Congress are now attempting to reverse that rule through a Congressional Review Act resolution. Undoing these certification requirements would have no impact on the efficiency standards for these products but would create confusion.*

The appliance standards program includes certification and labeling requirements and enforcement provisions, which DOE periodically updates. In October 2024, DOE published a [final rule](#) that primarily makes updates to reporting requirements. DOE's reporting requirements outline the specific information that manufacturers of a given product type must submit to the department for each of their models. For example, for room air conditioners, manufacturers report efficiency, cooling capacity, and power input. Manufacturers generally support the updated certification requirements.

## The certification rule has no impact on efficiency standards

The October 2024 final rule made no changes to DOE's efficiency standards for any product. Manufacturers must comply with existing efficiency standards regardless of which certification requirements are in place.

## The certification rule makes inconsequential changes to labeling and enforcement provisions

The October 2024 final rule made two very minor changes to DOE's labeling requirements and enforcement provisions; both changes are for walk-in coolers and freezers. The final rule updates existing labeling requirements for walk-in panels to require that the label include the date of manufacture. The final rule also includes an enforcement provision for walk-in refrigeration systems specifying that DOE will perform a compressor break-in period during verification or enforcement testing if a break-in period duration is specified in the manufacturer's certification report.

## Manufacturers generally support DOE's certification requirements

In [comments](#) on the September 2023 proposed rule for certification requirements, the Association of Home Appliance Manufacturers (AHAM) said that "consistent, clear, transparent certification criteria are a critical part of the program" and that "AHAM appreciates DOE's proposals that are aimed at ensuring consistency between testing to support certification and testing DOE does to support its enforcement efforts." The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) [noted](#) "the care taken by DOE staff to develop proposed amendments to certification provisions, labeling requirements, and



enforcement provisions” and said that it was “largely supportive of changes.” Carrier [commented](#) that “having these requirements provides predictability for manufacturers and valuable information for consumers.” And Rheem Manufacturing Company [stated](#) that “Rheem appreciates DOE’s efforts to update the certification, labeling, and enforcement requirements.”

In response to comments and suggestions from manufacturers on the proposed rule, DOE made a number of changes in the final rule, including removing several proposed reporting requirements and a proposed labeling requirement.

## Undoing the certification rule would create confusion

While undoing the certification rule would have no impact on DOE’s efficiency standards, it would create confusion. For example, for small, three-phase air conditioners and heat pumps, prior to the publication of the October 2024 final rule, manufacturers were required to report cooling and heating efficiency based on the SEER and HSPF metrics, respectively. However, new standards that took effect on January 1, 2025, are based on updated efficiency metrics—SEER2 and HSPF2. The certification final rule updated the reporting requirements for these products to reference the new efficiency metrics. Undoing the rule would create confusion as to how manufacturers are supposed to certify small, three-phase air conditioners and heat pumps.

For external power supplies, a recent update to the test procedure added a provision for units that are not shipped with an output cord; in these cases, the external power supply is tested with an output cord specified by the manufacturer. The certification final rule added a reporting requirement for specifications of the manufacturer-recommended output cord. Undoing the rule would create confusion as to how DOE will select an output cord in conducting any verification or enforcement testing for external power supplies that are not shipped with an output cord.

For automatic commercial ice makers, prior to the publication of the October 2024 final rule, the sampling provisions used as part of the certification process stated that the upper confidence limit should be calculated using the Student’s t-Distribution Values for a two-tailed confidence interval. However, the values provided in the regulations were for a one-tailed confidence interval. The final rule clarified that the confidence limit should be calculated using a one-tailed confidence interval. Undoing the rule would re-introduce confusion regarding the sampling provisions for automatic commercial ice makers.

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