

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
National Consumer Law Center

March 28, 2025

Mr. Jeremy Domm
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-2B
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE-2017-BT-STD-0007: Energy Conservation Standards for Refrigerators, Freezers, and Refrigerator-Freezers

Dear Mr. Domm:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and the National Consumer Law Center (NCLC) on behalf of its low-income clients on the delay of effective date for the standards for commercial refrigerators, freezers, and refrigerator-freezers. 90 Fed. Reg. 11466 (March 7, 2025). We appreciate the opportunity to provide input to the Department.

The new standards for commercial refrigeration equipment (CRE) will save American businesses billions. The recently finalized standards for CRE, which take effect in 2029, will save businesses like grocery stores, convenience stores, and restaurants up to about \$265 million per year in electricity bill savings.¹ In total, bill savings from the finalized CRE standards are expected to reach up to about \$4.6 billion over 30 years.² These savings are achievable by incorporating proven, cost-effective technologies that are widely available on the market today.

DOE cannot further delay the effective date of the final rule. As outlined in the comments from Earthjustice, delaying the effective date violates the anti-backsliding provision. Further, as noted by DOE in the effective date delay publication, delaying the effective date of the final rule (i.e., when the rule goes into the Code of Federal Regulations) to May 20, 2025 does not affect the compliance date of the finalized standards. Thus, manufacturers will still need to comply with the amended CRE standards by January 2029. Further delays of the effective date would create additional uncertainty for CRE manufacturers who have likely begun making capital investments to meet the amended standards.

Thank you for considering these comments.

Sincerely,

¹90 Fed. Reg. 7464, 7473 (January 21, 2025).

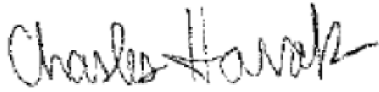
²90 Fed. Reg. 7464, 7471 (January 21, 2025).



Jeremy Dunklin, PhD
Senior Technical Advocacy Associate
Appliance Standards Awareness Project



Matt Malinowski
Director, Buildings Program
American Council for an Energy-Efficient Economy



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