Appliance Standards Awareness Project

April 7, 2021

Tanja Crk
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Commercial Electric Cooktops Version 1.0 Discussion Guide

Dear Ms. Crk,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the Commercial Electric Cooktops Version 1.0 Discussion Guide released on February 24, 2021. We appreciate the opportunity to comment.

We support EPA establishing an ENERGY STAR specification for commercial electric cooktops. Because there is no current Department of Energy (DOE) federal standard for commercial cooktops, energy use across individual models has the potential to vary significantly and large energy savings are likely possible with the introduction of an ENERGY STAR specification. The Food Service Technology Center (FSTC) determined that commercial electric resistance cooktops can have efficiencies ranging from 60-85%.[1] Demand for induction cooktops is increasing in the commercial sector due to its improved energy efficiency as compared to electric resistance and gas cooktops. Furthermore, induction cooktops can eliminate the need for expensive ventilation equipment required for gas cooktops.[2] With growing interest in building electrification, an ENERGY STAR specification for commercial electric cooktops can be valuable in identifying the most efficient electric cooktops and assist the transition to more energy efficient commercial kitchens.

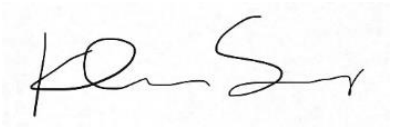
We encourage EPA to adopt a test procedure that is representative of how commercial cooktops are used in the field. We believe that it would make sense for the certification criteria to reflect a weighted average of the three efficiency tests (boil, simmer, and sauté) based on relative usage in the field. As EPA notes in the Discussion Guide, the FSTC conducted testing on induction cooktops and concluded that the simmer and sauté tests are representative of how cooktops are used in the field and show significant performance differences across the range of equipment tested.[3] The relative ranking of products based on the simmer test and sauté test can be significantly different than solely based on the boil test. Including all three tests in an

[1] https://webtools.dnvgl.com/projects/Portals/8/Public%20Files/Energy%20Efficient%20Cooking%20Equipment%20Technical%20Session%20Presentation%20-%206.30.16.pdf?ver=2018-10-05-204828-190.
[2] https://www.grandviewresearch.com/industry-analysis/induction-cooktops-market.
[3] https://fishnick.com/cecplug/Induction_Cooktop_Analysis_Report.pdf.

energy efficiency rating is therefore important for providing representative results and accurate information to consumers.

Thank you for considering these comments.

Sincerely,



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