



April 17, 2023

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–AD15: Supplemental Notice of Proposed Rulemaking for Energy Conservation Standards for Consumer Conventional Cooking Products

Dear Dr. Shapiro:

We are writing in support of the Department’s proposed standards for cooking products. Improving the efficiency of cooking products would reduce greenhouse gas emissions and other pollutants—benefiting our climate, the environment, and human health. Due to the demonstrated environmental and economic benefits, we strongly support the proposed standards and urge DOE to promptly publish a final rule.

DOE has proposed standards for cooking tops and conventional ovens that would provide meaningful energy savings for the nation and cost savings of up to \$1.7 billion for U.S. consumers.¹ Gas and electric cooking tops have never had to meet any efficiency performance requirements; in effect, some models use far more energy than others to do the same amount of cooking. The Department’s analysis shows that the proposed standards would reduce energy use by about 30% for both gas and electric cooking tops, relative to the least efficient products on the market today. These proposed standards would ensure that manufacturers update their models with features that specifically improve cooking efficiency, reducing consumers’ utility bills and planet-warming emissions.

Inefficient cooking products require more energy to operate, and DOE’s analysis shows that on average, any increase in purchase cost under the proposed standards would be paid back in electric or gas bill savings well within the life of the product.² DOE estimates that these standards along with those under development for other household appliances and products will all together save

¹ 88 Fed. Reg. 6821.

² 88 Fed. Reg. 6893.

consumers about \$570 billion over 30 years of sales, resulting in annual savings of more than \$100 per household.³

Furthermore, the proposed cooking product standards would cut 22 million metric tons of carbon dioxide emissions, 245 thousand tons of methane emissions, and 52 thousand tons of NOx emissions over 30 years of sales.⁴ These standards would also improve indoor air quality and reduce exposure to pollutants for households with gas stoves by enabling the same amount of cooking with less in-home gas combustion, resulting in lower health harms.⁵

If finalized, the proposed standards for cooking products will help to address the climate crisis, reduce health harms, and ease energy burdens on American consumers. We urge the Department to finalize this proposed rule.

Sincerely,



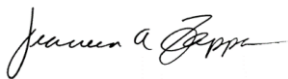
Steve Nadel
Executive Director
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Campaign for 100% Renewable Energy
Environment America



Jeaneen Zappa
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Aileen Hull
Dayton Energy Collaborative
Community Engagement Coordinator



Timothy Ballo
Earthjustice
Senior Attorney



Elevate Energy
Principal Director of Policy
Elevate Energy



Joseph Vukovich
Energy Efficiency Advocate
NRDC

³ DOE Proposes New Standards for Residential Appliances to Save Americans Billions in Annual Energy and Water Bill, February 10, 2023. <https://www.energy.gov/articles/doe-proposes-new-standards-residential-appliances-save-americans-billions-annual-energy#:~:text=Today's%20proposals%20build%20on%20the,annually%20through%20lower%20energy%20bills.>

⁴ 88 Fed. Reg. 6893.

⁵ 88 Fed. Reg. 6863-6864.



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