

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy  
National Consumer Law Center, on behalf of its low-income clients  
Natural Resources Defense Council

September 1, 2023

Dr. Carl Shapiro  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
Building Technologies Office, EE-5B  
1000 Independence Avenue SW  
Washington, DC 20585

**RE: Docket Number EERE-2014-BT-STD-0005/RIN 1904-AD15: Notice of Data Availability for Energy Conservation Standards for Consumer Conventional Cooking Products**

Dear Dr. Shapiro:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), National Consumer Law Center, on behalf of its low-income clients (NCLC), and Natural Resources Defense Council (NRDC) on the notice of data availability (NODA) for energy conservation standards for consumer conventional cooking products. 88 Fed. Reg. 50810 (August 2, 2023). We appreciate the opportunity to provide input to the Department.

**We support DOE's updated analysis.** For the NODA, DOE updated its technical analysis for consumer conventional cooking products based on data and information it received from stakeholders in response to the February 2023 supplemental notice of proposed rulemaking (SNOPR). Namely, DOE revised the baseline, intermediate, and max-tech efficiency levels for gas cooking tops to reflect the updated test sample and ensure availability of models with multiple high input rate (HIR) burners.<sup>1</sup> DOE also updated market share estimates in the no-new-standards case for electric smooth and gas cooking tops based on shipment estimates recently provided by manufacturers.<sup>2</sup> We support this updated analysis, which reflects the most up-to-date data available.

**We encourage DOE to adopt the revised Efficiency Level (EL) 1 for gas cooking tops.** For the NODA, DOE revised EL 1 for gas cooking tops to represent models that could have a

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<sup>1</sup> 88 Fed. Reg. 50812.

<sup>2</sup> 88 Fed. Reg. 50814-50815.

combination of features valued by consumers, such as all HIR burners, continuous cast-iron grates, multi-ring HIR burners, and/or extra-high input rate burners. Models at EL 1 would reduce energy use by about 15%, relative to today's least efficient models, and DOE estimated that 90% of gas cooking top shipments would already meet this level.<sup>3</sup> Amended standards at this level would provide the maximum improvement in energy efficiency with positive net present value savings for consumers.

**For all remaining product classes, DOE should finalize the standards that were proposed in the SNOPR.** In the February 2023 SNOPR, DOE proposed performance-based standards for electric cooking tops and prescriptive requirements for conventional ovens that would provide meaningful energy savings for the nation. DOE's analysis in the NODA continues to show that the proposed standards for electric smooth cooking tops and electric and gas ovens would be cost-effective for consumers.<sup>4</sup> Thus, for product classes other than gas cooking tops, we support the levels previously proposed by DOE.

Thank you for considering these comments.

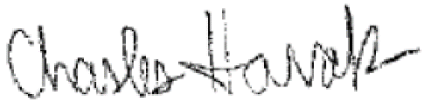
Sincerely,



Kanchan Swaroop  
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Appliance Standards Awareness Project



Jennifer Amann  
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American Council for an Energy-Efficient Economy



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



Joe Vukovich  
Energy Efficiency Advocate  
Natural Resources Defense Council

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<sup>3</sup> Ibid.

<sup>4</sup> The proposed standard for electric coil cooking tops is at the baseline, so these products were not included in the NODA.