

Appliance Standards Awareness Project  
Consumer Federation of America  
Natural Resources Defense Council

March 1, 2021

Dr. Stephanie Johnson  
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: Notification of Proposed Determination for Energy Conservation Standards for Consumer Conventional Cooking Products**

Dear Dr. Johnson:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Consumer Federation of America (CFA), and Natural Resources Defense Council (NRDC) on the notification of proposed determination (NOPD) for energy conservation standards for consumer conventional cooking products. 85 Fed. Reg. 80982 (December 14, 2020). We appreciate the opportunity to provide input to the Department.

DOE must work to establish test procedures for cooking products and complete the revision of the Process Rule prior to proceeding with a determination for cooking products standards. The test procedures for cooking tops and conventional ovens have been repealed, yet DOE utilized the repealed test procedures to estimate savings in the analysis for this NOPD. In addition, DOE has indicated that they are in the process of revising the Process Rule,<sup>1</sup> yet the Department cited the energy savings thresholds in the current Process Rule to justify the proposed determination of no amended standards. With billions of consumer savings at risk, DOE should not move forward with this determination until the Department completes the indicated revisions to the Process Rule and advances test procedures for cooking products.

**DOE should set aside this proposed determination and instead focus on developing test procedures for cooking products.** In the NOPD, DOE has analyzed performance standards,<sup>2</sup> and yet there are currently no DOE test procedures for either cooking tops or conventional ovens. Rather, DOE has inexplicably used the repealed test procedures for both cooking tops and ovens to evaluate potential standard levels.<sup>3</sup> Furthermore, performance-based standards have the potential to achieve significantly greater savings than prescriptive requirements. DOE should therefore work to establish test procedures before moving forward with a determination for these products.

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<sup>1</sup> [https://www.energy.gov/sites/prod/files/2021/02/f82/eere\\_eo13990\\_memo\\_1.pdf](https://www.energy.gov/sites/prod/files/2021/02/f82/eere_eo13990_memo_1.pdf).

<sup>2</sup> DOE evaluated various performance standards that are associated with specific design options which would require test procedures.

<sup>3</sup> <https://www.regulations.gov/document?D=EERE-2014-BT-STD-0005-0080>. p. 11.

**DOE was inconsistent when screening out technology options.** In the technical support document for this NOPD, DOE cited the lack of a test procedure for its decision to screen out the optimized burner and grate design technology option for gas cooking tops.<sup>4</sup> However, other technology options that also rely on a test procedure, such as improved insulation and improved door seals, were kept in the analysis. The omission of the optimized burner and grate design technology option underscores the importance of establishing test procedures prior to conducting analysis of potential standards.

**As part of the revisions to the Process Rule, DOE should eliminate the arbitrary energy savings thresholds.** This NOPD highlights the harm of the current Process Rule, particularly the requirement that new standards must meet a minimum savings threshold or energy savings improvement. In the analysis for this NOPD, DOE found that standards set at trial standard level (TSL) 2 would result in total full-fuel-cycle energy savings of 0.6 quads with incremental costs as low as \$1, depending on the product class.<sup>5</sup> Adopting standards at TSL 2 for electric smooth cooking tops would provide full-fuel-cycle energy savings of 0.28 quads and consumer net present value (NPV) savings of up to \$2 billion with an incremental cost of only \$3. Standards for self-cleaning freestanding electric ovens could achieve full-fuel-cycle energy savings of 0.1 quads and NPV savings of up to \$730 million with an incremental cost of \$1. In total, consumers could save up to \$3.7 billion.<sup>6</sup> However, DOE rejected TSL 2 since it did not meet the thresholds for site energy savings or energy savings improvement. DOE's proposed determination would thus sacrifice billions of dollars in potential savings for consumers. As part of the revisions to the Process Rule, DOE should eliminate the energy savings thresholds in order to ensure that these critical energy and utility bill savings are not lost.

Thank you for considering these comments.

Sincerely,



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Technical Advocacy Associate  
Appliance Standards Awareness Project



Richard Eckman  
Energy Research Associate  
Consumer Federation of America



Joe Vukovich  
Energy Efficiency Advocate  
Natural Resources Defense Council

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<sup>4</sup> <https://www.regulations.gov/document?D=EERE-2014-BT-STD-0005-0076>. p. 4-4.

<sup>5</sup> 85 Fed. Reg. 81049.

<sup>6</sup> 85 Fed. Reg. 81050.