

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy

May 22, 2023

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 Draft 2**

Dear Ms. Crk,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and American Council for an Energy-Efficient Economy (ACEEE) on the Commercial Electric Cooktops Version 1.0 Draft 2 released on April 20, 2023. We appreciate the opportunity to comment.

**We support the ENERGY STAR commercial electric cooktops Draft 2 specification.** We believe that the ENERGY STAR specification for commercial electric cooktops will be valuable in identifying the most efficient electric cooktops and assisting the transition to more energy efficient commercial kitchens. As EPA shows in the Draft 2 Data Packet, energy use across commercial electric cooktop models can vary significantly. EPA estimates that the proposed criteria would result in per-unit annual operating cost savings of \$50 and CO<sub>2</sub> emissions reductions of over 700 pounds.<sup>1</sup> In addition, we support EPA's proposal to certify electric cooktops based on each hob passing the cooking energy efficiency criterion. This change will ensure that each individual hob on the cooktop meets the minimum efficiency performance threshold.

**We support the reporting requirements proposed in the Draft 2 specification.** In addition to energy efficiency levels, EPA is proposing to include reporting requirements that would provide purchasers with supplementary information when comparing ENERGY STAR certified products such as the total number of hobs on the cooktop, the maximum electrical energy input rate of each hob, and the simmer test results. These reporting requirements could also help EPA further refine the ENERGY STAR specification in the future.

Thank you for considering these comments.

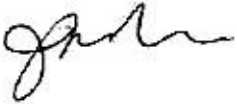
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<sup>1</sup> ENERGY STAR Commercial Electric Cooktops Draft 2 Data Package.  
<https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Commercial%20Electric%20Cooktops%20Version%201.0%20%20Draft%202%20Data%20Package.xlsx>.

Sincerely,

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Kanchan Swaroop  
Senior Technical Advocacy Associate  
Appliance Standards Awareness Project

A handwritten signature in black ink, appearing to read 'Jennifer Amann', written on a light-colored rectangular background.

Jennifer Amann  
Senior Fellow  
American Council for an Energy-Efficient Economy