

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Consumer Federation of America
Natural Resources Defense Council
Northwest Energy Efficiency Alliance

October 12, 2021

Dr. Stephanie Johnson
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–2017–BT–STD–0023/RIN 1905–AE01: Notice of Proposed Determination for Energy Conservation Standards for Microwave Ovens

Dear Dr. Johnson:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), Consumer Federation of America (CFA), Natural Resources Defense Council (NRDC), and Northwest Energy Efficiency Alliance (NEEA) on the notice of proposed determination for energy conservation standards for microwave ovens. 86 Fed. Reg. 44298 (August 12, 2021). We appreciate the opportunity to provide input to the Department.

We encourage DOE to reconsider its proposed negative determination and evaluate additional potential efficiency levels. The current energy conservation standards, which address standby mode energy use, set the maximum allowable average standby power at 1 W for Product Class 1 (microwave-only ovens and countertop convection microwave ovens). For this proposed determination, DOE has evaluated only a single potential efficiency level of 0.84 W for Product Class 1 which represents the vast majority of shipments.¹ In the last rulemaking, DOE identified a max-tech efficiency level of 0.02 W based on automatic power-down technology. While this technology option has been screened out in the current analysis, there are additional potential efficiency levels between the level associated with automatic power down and the current 1 W standard. At the public meeting on September 13, DOE's consultants stated that the Department tore down a microwave oven with a standby power consumption of 0.6 W that did not employ automatic power down.² In addition, we examined the DOE Compliance Certification Database and found microwave oven models with rated standby power levels spanning the range from 0.1 W to 1 W.³ Furthermore, multiple models listed in the database have average standby power levels significantly below 0.84 W, yet do not seem to have automatic power-

¹ According to the 2013 final rule for microwave oven standards, Product Class 1 represents 99% of total shipments.

² <https://www.regulations.gov/document/EERE-2017-BT-STD-0023-0013>. pp. 24-25.

³ Models found in DOE Compliance Certification Database as of 10/1/21.

down features.⁴ Therefore, we encourage DOE to evaluate additional efficiency levels and to reassess this proposed determination.

If DOE does not evaluate additional efficiency levels, we urge the Department to consider adopting the efficiency levels that were evaluated for this proposed determination. DOE's analysis shows that strengthening microwave oven standards can result in considerable energy savings with only a slight increase in manufacturing costs. For both product classes, DOE estimated that the max-tech levels would result in an incremental manufacturing cost of just \$0.16 for energy savings of 8% over the 30-year analysis period. The overall cost-effectiveness of these efficiency levels is unknown because DOE cites the Process Rule energy savings thresholds as a reason not to evaluate life cycle costs and payback period.⁵ However, DOE has proposed to eliminate the current energy savings thresholds.⁶ DOE's proposed determination is thus potentially sacrificing millions of dollars in savings for consumers without understanding the full impact of potential amended standards. For these reasons, we encourage DOE to reexamine its proposed negative determination.

Thank you for considering these comments.

Sincerely,



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⁴ For example, see the Cuisinart AMW-60 (<https://www.cuisinart.com/globalassets/catalog/appliances/microwaves/3-in-1-microwave-airfryer-oven/amw-60.pdf>) and Sharp SMC1655BS (<https://content.syndigo.com/asset/58ce6a17-df88-4828-aa4b-ce1608814b11/original.pdf>), which have rated standby power levels of 0.5 W and 0.4 W, respectively. Neither product manual references an automatic power-down feature.

⁵ 86 Fed. Reg. 44310.

⁶ 86 Fed. Reg. 18905 (April 12, 2021).