

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

March 13, 2025

Mr. Troy Watson
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-2B
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE-2017-BT-STD-0009: Energy Conservation Standards for Walk-In Coolers and Freezers

Dear Mr. Watson:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and the American Council for an Energy-Efficient Economy (ACEEE) on the delay of effective date for the walk-in coolers and freezers standards. 90 Fed. Reg. 9951 (February 20, 2025). We appreciate the opportunity to provide input to the Department.

The new standards for walk-in coolers and freezers will save American businesses billions. The recently finalized standards for walk-in coolers and freezers, which take effect in late 2027 for non-display doors and late 2028 for refrigeration systems, will reduce electricity bills for businesses like restaurants, convenience stores, and grocery stores by up to about \$370 million per year.¹ Cumulatively, DOE estimates that electricity bill savings will reach up to about \$6.5 billion over 30 years of equipment sales.² These savings can be achieved using cost-effective technologies that reduce energy waste.

DOE cannot further delay the effective date of the final rule. As outlined in the comments from Earthjustice, delaying the effective date violates the anti-backsliding provision. In addition, as DOE notes in the delay of effective date publication, delaying the effective date of the final rule (i.e., when the rule goes into the Code of Federal Regulations) to March 21, 2025 does not affect the compliance date of the finalized standards. In other words, manufacturers will still need to comply with the amended standards in late 2027 for non-display doors and late 2028 for refrigeration systems. Further delays of the effective date would create uncertainty for manufacturers who have likely begun making capital investments to meet the amended standards.

Thank you for considering these comments.

Sincerely,

¹89 Fed. Reg. 104628 (December 23, 2024).

² 89 Fed. Reg. 104622.



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