Appliance Standards Awareness Project
Alliance to Save Energy
Consumer Federation of America
Natural Resources Defense Council
Northwest Energy Efficiency Alliance
Northwest Power and Conservation Council

November 2, 2016

Mr. John Cymbalsky
U.S. Department of Energy
Building Technologies Program
950 L'Enfant Plaza SW
Room 6094
Washington, DC 20024

**RE: Docket Number EERE–2014–BT–STD–0005/RIN 1904–AD15**: **Supplemental Notice of Proposed Rulemaking for Energy Conservation Standards for Residential Conventional Cooking Products**

Dear Mr. Cymbalsky:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Alliance to Save Energy, Consumer Federation of America (CFA), Natural Resources Defense Council (NRDC), Northwest Energy Efficiency Alliance (NEEA), and Northwest Power and Conservation Council (NPCC) on the supplemental notice of proposed rulemaking (SNOPR) for energy conservation standards for residential conventional cooking products. 81 Fed. Reg. 60784 (September 2, 2016). We appreciate the opportunity to provide input to the Department.

**Based on DOE's analysis for the SNOPR, we support the proposed standards for residential conventional cooking products.** DOE estimates that the proposed standards would save 0.76 quads of energy over 30 years of sales and yield net present value (NPV) savings of $2.7-6.2 billion for consumers.[1] The proposed standards would require more-efficient power supplies and ignition systems for ovens and would set energy performance standards for cooking tops. DOE's analysis shows that the proposed performance standards for cooking tops can be met by "commercial-style" units, which tend to be less efficient than traditional residential-style cooking tops. In particular, the proposed standards can be met by commercial-style cooking tops with cast iron grates and a six surface unit configuration with at least four out of the six surface units having burner input rates greater than 14,000 Btu/h. The NOPR notes that "DOE selected these criteria to maintain the full functionality of cooking tops marketed as commercial-style."[2]

**We do not support a prescriptive design requirement for the power supply for cooking tops in place of an approach that captures standby/off mode power consumption as part of the performance standards.** In the notice announcing an extension of the comment period, DOE

[1] 81 Fed. Reg. 60787.
[2] 81 Fed. Reg. 60817. The proposed standards for gas cooking tops are equivalent to EL 1.

solicits comment on an approach that would adopt a prescriptive standard for the power supply for cooking tops similar to that proposed for ovens, which would prohibit linear power supplies.[3] The proposed standards for cooking tops are expressed in terms of annual energy consumption, which includes any standby and off mode energy consumption. While switch-mode power supplies are generally more efficient than linear power supplies, DOE's test data show that the standby power consumption of cooking tops with switch-mode power supplies is not necessarily lower than that of cooking tops with linear power supplies. For example, one unit in DOE's test sample with a linear power supply had a measured standby power consumption of 2.36 W, while another unit with a switch-mode power supply had a measured standby power consumption of 2.96 W.[4] Further, the proposed standard for electric smooth cooking tops assumes a standby power of 0.25 W, which is based on the unit in DOE's test sample with the lowest standby power consumption and can be achieved with a switch-mode power supply combined with an automatic power-down feature.[5] DOE's analysis shows that a switch-mode power supply reduces annual energy consumption by about 5%, while a switch-mode power supply combined with an automatic power-down feature reduces annual energy consumption by about 16%.[6] Therefore, it appears that a prescriptive design requirement for the power supply for cooking tops in place of an approach that captures standby/off mode power consumption as part of the performance standards would result in significant lost energy savings.

Thank you for considering these comments.

Sincerely,

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[3] 81 Fed. Reg. 67220. (September 30, 2016).
[4] Technical Support Document. p. 5-35.
[5] 81 Fed. Reg. 60817. The proposed standards for electric smooth cooking tops are equivalent to EL 2.
[6] 81 Fed. Reg. 60817. Table IV.19.

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