Appliance Standards Awareness Project
Alliance to Save Energy
American Council for an Energy-Efficient Economy
Consumer Federation of America
Consumers Union
National Consumer Law Center

April 14, 2014

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Mailstop EE-2J
Washington, DC 20585

RE: Docket Number EERE–2014–BT–STD–0005/ RIN 1904–AD15: Request for Information for Residential Conventional Cooking Products

Dear Ms. Edwards:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), Alliance to Save Energy (ASE), American Council for an Energy-Efficient Economy (ACEEE), Consumer Federation of America (CFA), Consumers Union (CU), and National Consumer Law Center (NCLC) on the request for information (RFI) for residential conventional cooking products. 79 Fed. Reg. 8337 (February 12, 2014). We appreciate the opportunity to provide input to the Department.

We support DOE's tentative plan to consider energy conservation standards for all residential conventional cooking products including commercial-style gas cooking products and residential-scale units with higher burner input rates. In the RFI, DOE notes that there are a significant number of residential gas cooking products advertised as commercial-style (or "professional-style") and also a number of residential gas cooking products that manufacturers do not advertise as commercial-style but that have a surface burner rated above 14,000 Btu/h.[1] We expect that we may see a significant increase in the market share of commercial-style gas cooking products and residential-scale units with higher burner input rates. Therefore, there may be significant potential energy savings from efficiency standards for these products. In addition, including commercial-style gas cooking products and residential-scale units with higher burner input rates in this rulemaking will allow for providing information to consumers about the efficiency and/or energy use of these products compared to that of other residential cooking products.

DOE's preliminary test data show that there is significant variation in efficiency among both electric smooth cooktops and induction cooktops. Table 1 below shows test results presented in the 2013 test procedure NOPR using the "large" stainless steel hybrid test blocks.

[1] 79 Fed. Reg. 8340.

The data show that for the electric smooth cooking top (Cooking Top B), Surface Unit 2 is 20% more efficient than Surface Unit 1. For the three induction cooking tops, Cooking Tops D and E are 16% more efficient than Cooking Top F. In addition, while DOE found that induction cooking tops were 9.8% more efficient than electric smooth cooking tops on average based on a limited sample,[2] one of the induction cooking tops—Cooking Top F—is less efficient than Surface Unit 2 on the electric smooth cooking top.

Table 1. DOE Test Data for Electric Smooth and Induction Cooking Tops Using "Large" Stainless Steel Hybrid Test Blocks[3]

Heating Technology	Cooking Top	Surface Unit	Mean Efficiency (%)
Electric Smooth	B	1	49.5
		2	59.6
Induction	D	1	64.2
	E	1	64.3
	F	1	55.6

Since there is significant variation in the efficiency of currently-available cooking tops, energy conservation standards will both drive efficiency improvements and allow manufacturers to market the energy-saving benefits of high-efficiency products.

We are pleased that DOE is considering switch-mode power supplies and low standby power consumption as technology options in addition to the technology options considered in the 2009 rulemaking. The RFI notes that in addition to the technology options considered in the 2009 rulemaking, DOE is also planning to consider efficiency levels associated with switch-mode power supplies and 1-W standby power for electric smooth cooking tops and gas and electric ovens.[4] DOE's preliminary analysis for the RFI suggests that switch-mode power supplies could reduce energy consumption by 4-12% depending on the product class.[5] DOE also notes in the RFI that DOE test data show that conventional ovens have standby power consumption as high as 10.7 W, while the maximum limit in the EU is 1 W.[6]

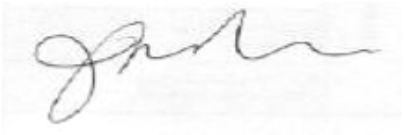
Thank you for considering these comments.

Sincerely,

Joanna Mauer
Technical Advocacy Manager
Appliance Standards Awareness Project

Rodney Sobin
Director of Research and Regulatory Affairs
Alliance to Save Energy

[2] *Ibid*. 8345.
[3] 78 Fed. Reg. 6239 (January 30, 2013). Table III.9.
[4] 79 Fed. Reg. 8345.
[5] *Ibid*. 8345-46. Based on a comparison of IAEC at the Baseline and Level 1.
[6] *Ibid*. 8344-45.



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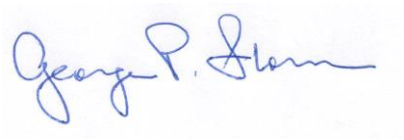

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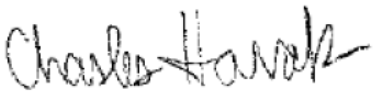

Charles Harak, Esq.
National Consumer Law Center
(On behalf of its low-income clients)