

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

December 22, 2022

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 1

Dear Ms. Crk,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and American Council for an Energy-Efficiency Economy (ACEEE) on the Commercial Electric Cooktops Version 1.0 Draft 1 released on November 10, 2022. We appreciate the opportunity to comment.

We strongly support EPA establishing an ENERGY STAR specification for commercial electric cooktops. As EPA shows in the Draft 1 Data Packet, energy use across commercial electric cooktop models can vary significantly. EPA estimates that the proposed criteria would result in per-unit lifetime energy savings of around \$1000 and CO₂ emissions reductions of nearly 14,000 pounds.¹ Furthermore, EPA estimates that purchasers would see average payback periods of just 0.4 years. We believe that an 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. Furthermore, it can help drive increased demand for induction cooktops, which may play an important role in decarbonization.

We continue to encourage EPA to investigate test procedures that are representative of how commercial cooktops are used in the field. In our comments on the V1.0 Discussion Guide, we encouraged EPA to consider a test procedure that would reflect a weighted average of the three efficiency tests (boil, simmer, and sauté) based on relative usage in the field.² EPA notes in the *Discussion Guide and Webinar Comment Matrix* that “the simmer and sauté tests may showcase the controllability of induction units, but consistent performance data for evaluation are unavailable. The length of time these units are in a simmer or sauté state during an

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

² Comments from the Appliance Standards Awareness Project on the Commercial Electric Cooktops Version 1.0 Discussion Guide. Sent via email, April 7, 2021.


'average' operating day is also unclear.”³ While we understand that usage data on simmer and sauté efficiencies are limited, we believe that including all three tests in an energy efficiency rating is important for providing representative results and accurate information to purchasers. Thus, we encourage EPA to collect additional data on relative usage in the field and continue to investigate how to incorporate these additional cooking methods into an efficiency metric.

Thank you for considering these comments.

Sincerely,



Kanchan Swaroop
Technical Advocacy Associate
Appliance Standards Awareness Project



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

³ ENERGY STAR Commercial Electric Cooktops Discussion Guide and Webinar Comment Matrix.
<https://www.energystar.gov/sites/default/files/asset/document/Commercial%20Electric%20Cooktop%20Discussion%20Guide%20and%20Webinar%20Comment%20Matrix.xlsx>.