

Appliance Standards Awareness Project

May 12, 2021

Tanja Crk
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Commercial Ovens Version 3.0 Draft 1 Specification

Dear Ms. Crk,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the Commercial Ovens Version 3.0 Draft 1 Specification released on March 31, 2021. We appreciate the opportunity to comment.

We support EPA revising the ENERGY STAR specification for commercial ovens and expanding the scope to include a greater variety of combination ovens. Commercial kitchens provide various opportunities for energy and greenhouse gas reductions, and energy efficient commercial ovens are becoming more readily available thanks in part to the ENERGY STAR specification. Based on the 2019 ENERGY STAR Unit Shipment and Market Penetration Report, the market penetration for ENERGY STAR certified commercial ovens is 51%.¹ We support EPA strengthening the idle rate and cooking-energy efficiency requirements to reflect the considerable market changes since the publication of the Version 2.2 specification. As EPA shows in the Draft 1 Data Packet, the proposed changes have the potential to achieve nationwide annual energy cost savings and emissions reductions of \$141 million and 2 million metric tons of CO₂, respectively.² The proposed specification will encourage continued innovation from commercial oven manufacturers and provide energy savings for purchasers.

Thank you for considering these comments.

Sincerely,



Kanchan Swaroop
Technical Advocacy Associate
Appliance Standards Awareness Project

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<https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Version%203.0%20Commercial%20Ovens%20Draft%201%20Cover%20Memo.pdf>.

² ENERGY STAR Version 3.0 Commercial Ovens Draft 1 Data Packet.