



*Submitted via regulations.gov*

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Dr. Carl Shapiro  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
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1000 Independence Avenue SW  
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**Re: Request for the Release of Information and an Extension of the Comment Period, *Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products*, EERE-2014-BT-STD-0005, RIN 1904-AD15, 88 Fed. Reg. 6818 (February 1, 2023)**

Dr. Shapiro:

The American Gas Association (“AGA”), American Public Gas Association (“APGA”), the National Propane Gas Association (“NPGA”), and Spire Inc., Spire Missouri Inc., and Spire Alabama Inc. (collectively, “Joint Requesters”) respectfully request that the Office of Energy Efficiency and Renewable Energy (“EERE”), Department of Energy (“DOE”), release information necessary to meaningfully comment on the supplemental notice of proposed rulemaking and request for comment (“SNOPR”)<sup>1</sup> and the technical support documents (“TSDs”) issued in *Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products*, EERE-2014-BT-STD-0005, RIN 1904-AD15, 88 Fed. Reg. 6818 (February 1, 2023). The information requested was not contained in the SNOPR, TSDs, or the notification of data availability (“NODA”) issued on February 28, 2023.<sup>2</sup> The Joint Requesters also seek additional time, once the requested information is released, to submit comments in this proceeding.

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 77 million residential, commercial, and industrial natural gas customers in the U.S., of which 95 percent — more than 73 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas

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<sup>1</sup> *Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products*, EERE-2014-BT-STD-0005, RIN 1904-AD15, 88 Fed. Reg. 6818 (Feb. 1, 2023).

<sup>2</sup> *Energy Conservation Program: Energy Conservation Standards for Consumer Conventional Cooking Products*, EERE-2014-BT-STD-0005, RIN 1904-AD15, 88 Fed. Reg. 12603 (Feb. 28, 2023).

pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one-third of the United States' energy needs.<sup>3</sup>

APGA is the trade association for more than 730 communities across the U.S. that own and operate their retail natural gas distribution entities. They include not-for-profit gas distribution systems owned by municipalities and other local government entities, all locally accountable to the citizens they serve. Public gas systems focus on providing safe, reliable, and affordable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications.<sup>4</sup>

NPGA is the national trade association of the propane industry with a membership of about 2,500 companies, and 36 state and regional associations representing members in all 50 states. NPGA's membership includes retail marketers of propane gas who deliver the fuel to the consumer, propane producers, transporters and wholesalers, and manufacturers and distributors of equipment, containers, and appliances. Propane, or liquefied petroleum gas, is used in millions of installations nationwide for home and commercial heating and cooking as well as various other agricultural, industrial, and transportation sectors.<sup>5</sup>

Spire Inc., Spire Missouri Inc., and Spire Alabama Inc. (collectively "Spire") are in the natural gas utility business. Spire Inc. owns and operates natural gas utilities that distribute natural gas to over 1.7 million residential, commercial, and institutional customers across Missouri, Alabama, and Mississippi, and Spire Missouri Inc. and Spire Alabama Inc. are the largest natural gas utilities serving residential, commercial, and institutional customers in Missouri and Alabama, respectively.

Joint Requesters provide the energy needed to fuel cooking products, thus making them critical stakeholders.

On February 1, 2023, DOE published in the Federal Register a supplemental notice of proposed rulemaking proposing new and amended energy conservation standards for consumer conventional cooking products, *i.e.*, the SNOPR. DOE provided stakeholders until April 3, 2023 to comment on the SNOPR. DOE also issued along with the TSDs several spreadsheets related to DOE's proposal. On February 3, 2023, the Association of Home Appliance Manufacturers ("AHAM") submitted a request for additional data and a corresponding request for additional time to comment. On February 23, 2023, DOE issued the NODA with certain additional information, but DOE declined to extend the comment period.

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<sup>3</sup> For more information, please visit [www.aga.org](http://www.aga.org).

<sup>4</sup> For more information, please visit [www.apga.org](http://www.apga.org).

<sup>5</sup> NATIONAL PROPANE GAS ASSOCIATION, TODAY'S PROPANE (2017), *available at* <https://npga.wpengine.com/wp-content/uploads/2017/08/NPGA-Todays-Propane-2017.pdf>.

Joint Requesters seek the following information from DOE in order to meaningfully comment on DOE's proposal.

## 1. Integrated Annual Energy Consumption

There appears to be a major inconsistency in the proposed minimum efficiency levels identified as the “integrated annual energy consumption” (“IAEC”) between electric cooktops (open coil and smooth element) and gas cooktops that needs to be explained by DOE prior to stakeholders being able to comment. Below is a summary of the 3 types mentioned in the SNOPR: electric, open coils (Tables IV.10), electric, smooth element (Table IV.11), and gas cook tops (Table IV.12), as well as levels proposed by DOE.

Heat Source	Proposed Standard (Table I.1)	Comparison to ‘Levels’ in ‘Cooking Top Efficiency’ Tables IV.10, IV.11, IV.12	Reduction from Baseline
Electric, open coil	199 kWh/yr	Baseline	0%
Electric, smooth element	207 kWh/yr	Level 1 (mid-point)	17%
Gas	1,204 kBtu/yr	Level 2 – Highest Measured Efficiency	32%

Information is needed on the specific design changes or enhancements to the gas cooktops to attain Level 2, and citing and justifying the proposed minimum requirement at 1,204 kBtu/yr. Joint Requests ask DOE to provide the design changes as well as the data and methodology used to determine this proposed minimum efficiency level for gas cooktops. It is important to note that the Level 2 proposal is a reduction of 32%, the highest measured efficiency level from the Baseline while for electric cooktops, there is no reduction for electric open coil cooktops and a 17% reduction from the Baseline for the Level 1 (mid-point) for electric, smooth element. This raises the question of the test procedure that was used to determine the Levels for gas cooktops. DOE acknowledges that the test procedure for gas cooktops is a modification of the IEC, Standard 60350-2017, “Household electric cooking appliances” stating that the “modifications including adapting the test method to gas cooking tops, normalizing the energy use of each test cycle to a consistent final water temperature ...”<sup>6</sup> The water temperature in the test procedure is critical in determining the energy usage and thus the IAEC level. DOE should provide stakeholders with the specific test procedure modifications and underlying data to determine the proposed IAEC level for gas cooktops. This will allow stakeholders to meaningfully comment and aid in transparency.

## 2. Testing of the Gas Cooktops

The NODA indicates that some of the cooktops in DOE's sample remain on the market and available for purchase, but others are no longer on the market. DOE should provide by the unit

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<sup>6</sup> SNOPR at 6831.

identification provided in the SNOPR, *i.e.*, the “SNOPR Unit ID,” which products are currently on the market and available for purchase. DOE should confirm the information it provides to stakeholders with the manufacturers of the products to ensure accuracy.

Once the requested information is provided to stakeholders, DOE should permit additional time to comment and extend the comment period by at least an additional 15 days after the requested information is released.

Joint Requesters thank you for the review and consideration of this letter. Joint Requesters would appreciate a response to this request as soon as possible. If you have any questions regarding this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,



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