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February 9, 2021

Peter Banwell
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Topic: Emerging Technology Award 2021 Draft Criteria for Residential Induction Cooktops

Dear Mr. Banwell:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the United States (U.S.) Environmental Protection Agency (EPA) ENERGY STAR® Emerging Technology Award (ETA) 2021 Draft Criteria for Residential Induction Cooktops.

The signatories of this letter, collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western U.S., serving over 32 million customers. As energy companies, we understand the potential of appliance efficiency standards to cut costs and reduce consumption while maintaining or increasing consumer utility of products. We have a responsibility to our customers to advocate for standards that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We appreciate the opportunity to provide comments about this ETA for Residential Induction Cooktops. We commend EPA for promoting this promising energy-saving technology for cooktops, and support EPA's proposed performance criteria for these products. We also support EPA's usage of the U.S. Department of Energy (DOE) test procedure for cooktops, as outlined in 10 CFR 430, Subpart B Appendix I. While this test procedure has since been withdrawn by DOE,¹ the CA IOUs continue to disagree with the justification used to support this action. While important questions have been raised by many stakeholders about the applicability of the test procedure for gas products, as well as the repeatability and reproducibility of the test procedure for both gas and electric products, the evidence put forth by stakeholders has procedural issues that limit their applicability in proving the unrepresentativeness of Appendix I. We believe that DOE should work with industry and energy efficiency advocates to further investigate any lingering issues with the applicability, repeatability, and reproducibility of the Cooking Products Test Procedure. In the interim, we do not believe EPA should be precluded from applying the withdrawn test procedure to its ETA for residential induction cooktops.

¹ The withdrawal of the DOE Test Procedure for Cooking Products was [published](#) on August 24, 2020.

In conclusion, we would like to reiterate our support for EPA's ETA 2021 Draft Criteria for Residential Induction Cooktops. We thank EPA for the opportunity to be involved in this process.

Sincerely,



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