



NYSERDA

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November 30, 2021

Ms. Tanja Crk, Product Manager

Via: cfs@energystar.gov

United States Environmental Protection Agency (EPA)

Washington, DC 20460

NYSERDA Comments on second draft of the ENERGY STAR Version 3.0 Commercial Ovens specification

Dear Ms. Crk:

The following comments are submitted on behalf of the New York State Energy Research and Development Authority (NYSERDA). NYSERDA is a public benefit corporation and offers information and analysis, innovative programs, technical expertise, and support to help New Yorkers increase energy efficiency, save money, use renewable energy, and reduce reliance on fossil fuels. NYSERDA's mission is to advance clean energy innovation and investments to combat climate change, improving the health, resiliency, and prosperity of New Yorkers and delivering benefits equitably to all. NYSERDA works to help implement New York State's nation-leading climate agenda, which is the most aggressive climate and clean energy initiative in the nation; New York is advancing an orderly and just transition to clean energy that creates jobs and continues fostering a green economy as our communities continue recovering from the COVID-19 pandemic.

NYSERDA recognizes the Environmental Protection Agency (EPA) and the ENERGY STAR program's success in the commercial food equipment industry. NYSERDA applauds EPA for updating the commercial oven specification to include water efficiency metrics and revise efficiency levels, and we appreciate EPA's efforts to push commercial oven efficiency to ensure there are options available across different price points within the market. The market transformation of the commercial food service industry is an important component of New York and the nation achieving its decarbonization goals.

Thank you for the opportunity to submit comments to the EPA on the Version 3.0 Draft 2 specification for commercial ovens. We respectfully submit these comments for your consideration.

NYSERDA recommends EPA finalize this specification while ensuring product offerings are sufficiently diverse.

Several states across the nation have recently established state appliance efficiency standards for commercial ovens at the ENERGY STAR Version 2.2 levels,¹ which will significantly reduce greenhouse gas emissions from this product

¹ From the Appliance Standards Awareness Project <https://appliance-standards.org/product/commercial-ovens>

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category. In New York, we have estimated the lifetime value of such a standard would reduce emissions in the state by 0.2 million metric tons of carbon dioxide (MMTCO₂) and have a \$30 million net-present value. We know that more efficient commercial ovens will reduce emissions as well as bring utility bill savings to kitchen owners. As such, we support Version 3.0 ENERGY STAR levels that continue to push the commercial oven market towards more efficient equipment while maintaining a robust industry for high-efficient products that can meet the specification.

The ENERGY STAR program typically targets the top segment of the market, ideally ensuring approximately 15-20 percent of each product type qualify so consumers can access ENERGY STAR products, potentially with available rebates to help make those products more affordable. Due to the challenges caused by the pandemic, we have seen supply chain and market disruptions which have contributed to used commercial kitchen equipment being readily available. We urge EPA to ensure the final specification levels can be achieved by a diversity of products to help ensure consumers can find the product to meet their needs on the ENERGY STAR product list and are not turning to the used market of less efficient products.

Thank you for the opportunity to provide comments on the proposed Version 3.0 Draft 2 Commercial Oven specification. NYSERDA seeks to be a strong partner of EPA as we work together to advance state and national decarbonization priorities. Please do not hesitate to reach out to discuss these matters further.

Sincerely,



Chris Corcoran
Team Lead – Codes, Products, & Standards
New York State Energy Research and Development Authority (NYSERDA)