



February 17, 2022

Dr. Stephanie Johnson
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-2J
1000 Independence Avenue SW
Washington, DC 20585-0121

Submission via [regulations.gov](https://www.regulations.gov)

Re: The Office of Energy Efficiency and Renewable Energy's Notice of Proposed Rulemaking for Test Procedures for Cooking Products [Docket Number EERE-2021-BT-TP-0023]

Dear Dr. Johnson:

The American Gas Association (AGA) and the American Public Gas Association (APGA) appreciate the opportunity to provide comments in response to the Department of Energy's (DOE) notice of proposed rulemaking (NOPR) pertaining to test procedures for cooking products, which appeared in the Federal Register on November 4, 2021.¹ Although not appliance manufacturers, our members provide the energy needed to fuel gas-fired cooking products, making natural gas utilities a critical stakeholder in this work.

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 pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one-third of the United States' energy needs.²

APGA is the trade association for approximately 1,000 communities across the U.S. that own and operate their retail natural gas distribution entities. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies, all locally accountable to the citizens they serve. Public gas systems focus on providing safe, reliable, and affordable energy to their customers and support

¹ 86 Fed. Reg. 60971 (2021); *see also* 86 Fed. Reg. 71406 (Dec. 16, 2021) (notification of data availability and extension of comment period to Jan. 18, 2022) and 87 Fed. Reg. 2559 (Jan. 18, 2022) (notification of data availability and extension of public comment period until Feb. 17, 2022).

² For more information, please visit www.aga.org.

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.³

AGA and APGA believe that the efficiency test procedures developed by DOE are a key element in establishing minimum efficiency ratings for appliances and equipment covered by federal law. Accordingly, the test procedures must be developed in an open and transparent manner, based on technically sound and fact-based data that result in methods that are repeatable and provide reliable and consistent results.

Efficiency ratings for DOE covered products have substantial impacts in several areas including proof of compliance with minimum efficiency requirements and consumer confidence in established in programs such as EPA's ENERGY STAR®, which are informed by DOE's processes. Of course, the penalty of a manufacturer found with a non-compliant product(s) is substantial. Also, natural gas utilities support the manufacturing of efficient appliances to benefit both the customer and the environment, and this is accomplished through testing procedures that are concise, unambiguous, and provide reliable and repeatable results.

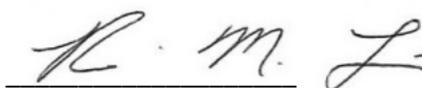
The DOE test procedures for cooking products under consideration in this rulemaking have proven to be challenging, *e.g.*, the proposed procedures do not appear to produce reliable and repeatable results. DOE must promulgate test procedures that are accurate, repeatable, and reproducible and not unduly burdensome to conduct. Unfortunately, DOE's current NOPR falls short of that standard. To remedy this, AGA and APGA support the recommended changes proposed by the Association of Home Appliance Manufacturers (AHAM). We believe that, when approved, AHAM's proposed changes will improve the cooking products testing procedure for repeatability, reliability, and ease of conduct.

Thank you for the review and consideration of these comments. If you have any questions regarding this submission, please do not hesitate to contact us.

Respectfully submitted,



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³ For more information, please visit www.apga.org.