

August 21, 2026

Mr. Pete Cochran
U.S. Department of Energy
Office of the General Counsel, GC-33
Building Technologies Office, CM-5B
1000 Independence Avenue SW
Washington, DC 20585

Dear Mr. Cochran:

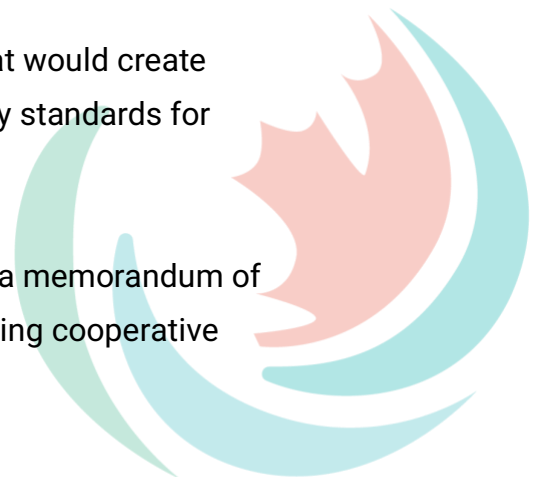
RE: Docket Number EERE-2025-BT-STD-0001: Notice of Proposed Rulemaking for Procedures, Interpretations, and Policies for Consideration of New or Revised Energy Conservation Standards and Test Procedures for Consumer Products and Certain Commercial/Industrial Equipment

Efficiency Canada appreciates the opportunity to provide input to the Department of Energy (DOE) on 91 FR 42034.

Efficiency Canada is the national voice for energy efficiency. Our mission is to create a sustainable environment and better life for all Canadians by making our country a global leader in energy efficiency policy, technology and jobs. Efficiency Canada is housed at Carleton University's Sustainable Energy Research Centre, which is located on the traditional unceded territories of the Algonquin nation.

Efficiency Canada opposes the proposed rulemaking that would create roadblocks for future administrations updating efficiency standards for appliances and equipment.

In 2021, the DOE and Natural Resources Canada signed a memorandum of understanding concerning cooperation on energy, including cooperative



activities, such as “collaborating on new and updated energy efficiency standards and test methods for energy-utilizing consumer products and equipment where legally permissible, and promoting industrial and commercial energy efficiency.”¹

Canada and the United States are currently aligned on energy efficiency and test standards for many appliance and equipment categories, including commercial and household air conditioners and heat pumps, general service lamps, air compressors, and refrigerator-freezers. The Government of Canada is currently proposing to align with the United States for more than a dozen additional categories.²

The U.S.’ historic leadership on appliance and equipment standards and our close trade relationship have made this harmonization advantageous for Canadians.

Additionally, several American industry organizations and manufacturers – like the Association of Home Appliance Manufacturers, the Air Conditioning, Heating and Refrigeration Institute, Lennox, Rheem, and A. O. Smith – have

¹ U.S. Department of Energy and Natural Resources Canada, “Memorandum of Understanding between the Department of Energy of the United States of America and the Department of Natural Resources of Canada Concerning Cooperation on Energy,” Energy.Gov, July 8, 2021, <https://www.energy.gov/node/4817131>.

² Natural Resources Canada, “Canada Gazette, Part 1, Volume 160, Number 25: Regulations Amending the Energy Efficiency Regulation, 2016 (Amendment 19),” Government of Canada, Government of Canada, Public Works and Government Services Canada, Integrated Services Branch, Canada Gazette, June 20, 2026, <https://gazette.gc.ca/rp-pr/p1/2026/2026-06-20/html/reg4-eng.html>.

publicly supported harmonization of energy efficiency and test standards between the U.S. and Canada.³

However, as this proposed rule would introduce a prohibitively high minimum savings threshold for new or strengthened efficiency standards, it could jeopardize North American harmonization. For Canada to continue adopting all economically justified and technologically feasible efficiency standards, it would need to break alignment with the United States, harming the American businesses that sell regulated appliances and equipment to Canada.

We urge the DOE not to add unnecessary process requirements that would limit the energy and cost savings that North American businesses and households would see from strengthened standards.

Thank you for considering these comments.

Sincerely,

Sarah Riddell

Senior Policy Research Associate, Appliance & Equipment Efficiency
Efficiency Canada

³ Natural Resource Canada, "Canada Gazette, Part 1, Volume 158, Number 25: Regulations Amending the Energy Efficiency Regulations, 2016 (Amendment 18)," Government of Canada, June 22, 2024, <https://www.gazette.gc.ca/rp-pr/p1/2024/2024-06-22/html/reg1-eng.html>.