



April 28, 2023

Mr. Lucas Adin  
U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy  
Building Technologies, EE-5B  
1000 Independence Avenue SW, Washington, DC 20585

Dear Mr. Adin:

We are writing in support of the U.S. Department of Energy’s proposed standards for residential refrigerators, refrigerator-freezers, and freezers. Improving the energy efficiency of these products would reduce consumer utility bills while also cutting greenhouse gas emissions and other pollutants—benefiting our climate, the environment, and human health. We strongly support the proposed standards and urge DOE to promptly publish a final rule.

Federal efficiency standards for residential refrigerators and freezers have not been updated in more than a decade, even as energy-saving technologies have improved. Many household refrigerators on the market today rely on outdated technologies that generate higher utility bills for consumers and needless climate pollution.

Adopting the proposed standards would ensure all models waste less energy. DOE’s proposed standards would prevent manufacturers from continuing to sell outdated appliances, thereby averting 179 million metric tons of harmful carbon dioxide emissions as well 275 thousand tons of nitrogen oxides over 30 years of sales. Reducing these pollutants helps to avoid a range of public health harms. Climate change will worsen some existing health threats while other new ones will emerge—including but not limited to respiratory diseases, premature deaths from extreme weather, and threats to mental health.

Refrigerators that meet the proposed standards would more than pay back their higher upfront cost by reducing electricity bills. DOE estimates that the proposed standards would save U.S. consumers \$20 billion over 30 years of sales. Furthermore, renters—who are disproportionately

low-income households—would particularly benefit from these standards since renters rarely get to choose their own refrigerator but typically pay the electricity bill.

If finalized, the proposed standards for residential refrigerators and freezers will help to address the climate crisis while simultaneously easing energy burdens on American consumers. We urge the Department to swiftly finalize this strong proposed rule.

Sincerely,

American Council for an Energy Efficient Economy – **Steve Nadel**, Executive Director  
American Lung Association – **Brittany Meyer**, National Director of Policy  
Climate Smart Missoula – **Abby Huseeth**, Energy Program Coordinator  
Coastal Conservation League – **Eddy Moore**, Energy Senior Program Director  
Earthjustice – **Timothy Ballo**, Senior Attorney  
Elevate Energy – **Anne McKibben**, Principal Director of Policy  
Energy Efficiency Alliance of New Jersey – **Jeaneen Zappa**, Executive Director  
Environment America – **Johanna Neumann**, Senior Director, Campaign for 100% Renewable Energy  
Health Care Without Harm – **Antonia Herzog**, Associate Director, Climate Policy and Advocacy  
Keystone Energy Efficiency Alliance (KEEA) – **Jeaneen Zappa**, Executive Director  
Montana Environmental Info Center (MEIC) – **Anne Hedges**  
NRDC – **Joseph Vukovich**, Energy Efficiency Advocate  
Southwest Energy Efficiency Project (SWEEP) – **Christine Brinker**, Senior Associate  
Upstate Forever – **Michael Coleman**, Energy Advocate  
US PIRG – **Matt Casale**, Environment Campaigns Director  
Utah Clean Energy – **Sarah Wright**, Executive Director