

CERTIFICATION UPDATES AS A RESULT OF THE RESCISSION OF THE 2024 DOE CERTIFICATION FINAL RULE

I. Background

On October 9, 2024, the U.S. Department of Energy (“DOE”) published in the Federal Register a Final Rule establishing and amending certification provisions, labeling requirements, and enforcement provisions for specific types of consumer products and industrial equipment. 89 FR 81994. The purpose of the rule was for DOE to revise its certification, labeling, and enforcement regulations for those covered products and equipment to align with amended test procedures and energy conservation standards established in separate rulemakings. The rule, titled "Energy Conservation Program for Appliance Standards: Certification Requirements, Labeling Requirements, and Enforcement Provisions for Certain Consumer Products and Commercial Equipment" (“2024 Final Rule”), took effect on December 23, 2024.

However, on May 9, 2025, the President signed into law a joint resolution that nullified the 2024 Final Rule. See Pub. L. No. 119-8. As a result, on September 9, 2025, DOE published a Final Rule that reverts the amendments made in the Code of Federal Regulations (“CFR”) by the 2024 Final Rule. See 90 FR 43371.

II. Certification Requirements

Each manufacturer, before distributing in commerce any basic model of a covered product or covered equipment subject to an applicable energy conservation standard set forth in parts 430 or 431, and annually thereafter, must submit to DOE a certification report certifying that each basic model meets the applicable energy conservation standard(s). 10 CFR § 429.12(a). These reports must include general information, such as brand name and product or equipment type, as well as information specific to the type of product or equipment being certified. Manufacturers are required to submit these reports to the DOE Compliance Certification Management System (“CCMS”), using certification templates provided by DOE.

In anticipation of the changes made in the 2024 Final Rule, DOE had issued updated certification templates for manufacturers to use in certifying the affected covered products and equipment. Since the 2024 Final Rule has been rescinded, DOE has revised those templates and provides the following information to manufacturers using those templates to certify their covered products and equipment.

III. Voluntary Certification: Manufacturers May Voluntarily Certify Information Rescinded from the 2024 Final Rule

DOE understands many manufacturers have already expended resources to comply with the requirements of the 2024 Final Rule. To reduce the burden and expense to manufacturers, DOE will give manufacturers the option to voluntarily report any product or equipment-specific information previously required by the 2024 Final Rule. DOE has added the designation “optional” to the column headers for the previously required information for each affected product or equipment in the relevant templates. Please refer to the specific template for more information.

DOE will continue to publish on the DOE [Compliance Certification Database](#) all properly certified basic models of covered product/equipment, including certifications that include all, some, or none of the optional information.

IV. Products/Equipment Affected

The 2024 Final Rule established new or amended reporting requirements for certain covered products and equipment to align with existing and new test procedures and/or energy conservation standards. Those new or amended reporting requirements were rescinded by the September 9, 2025 Final Rule and thus are optional, as discussed in the previous section of this document. Accordingly, DOE has made changes to the certification templates for the following covered products/equipment:

1. Dedicated-Purpose Pool Pump Motors
2. Air Cleaners
3. Direct expansion-dedicated outdoor air systems
4. Central Air Conditioners and Heat Pumps^a
5. Dishwashers
6. Residential Clothes Washers
7. External Power Supplies
8. Computer Room Air Conditioners
9. Commercial Water Heating Equipment^b
10. Walk-in Coolers and Freezers^c
11. Portable ACs
12. Air-Cooled, Three-Phase, Small Commercial Package Air Conditioners and Heat Pumps with a Cooling Capacity of Less Than 65,000 Btu/h and Air-Cooled, Three-Phase, Variable Refrigerant Flow Air Conditioners and Heat Pumps with a Cooling Capacity of Less Than 65,000 Btu/h

The September 9, 2025 Final Rule rescinded new or amended reporting requirements for other covered products and equipment, but those rescissions did not require any changes to the current certification templates. Accordingly, DOE has made no changes to the certification templates for the following covered products/equipment:

1. Pool Heaters
2. Dehumidifiers
3. Battery Chargers
4. Automatic Commercial Ice Makers
5. Commercial and Industrial Pumps
6. Compressors
7. Single Package Vertical Units
8. Ceiling Fan Light Kits

^a Multi-Split System Central Air Conditioners and Heat Pumps, Appendix M1 template is not affected.

^b Only the templates for Commercial Electric Storage and Commercial Electric Instantaneous Water Heaters are affected by the rescission; Commercial Gas- and Oil-Fired Storage Water Heaters and Commercial Unfired Hot Water Storage Tanks templates are not affected.

^c Only the templates for Walk-In Coolers and Freezers (WICFs) Doors and Refrigeration Systems are affected by the rescission; the template for Panels for WICFs is not affected.

FAQs

For purposes of this section, all templates requiring information in accordance with the 2024 Final Rule will be referred to as the “2024 template.” Any revised template, which makes reporting that information optional, will be referred to as the “new template.”

If I have already submitted a certification on the 2024 template, and included all the previously required information, should I resubmit on the new template?

No. If you have already submitted the information previously required by the 2024 Final Rule, you do not need to resubmit your certification report on the new template. Please use the new template for all future certifications.

Do I need to re-test a basic model to resubmit on the new template?

No. The 2024 Final Rule did not amend test procedures for any affected products/equipment. If a basic model was certified using the 2024 template, no re-testing is required to resubmit on the new template.

If I submitted a certification on the 2024 template, but omitted the previously required information, should I resubmit on the new template?

Yes. If you submitted a certification that left out the previously required information, please submit your certification on the new template that indicates that the previously required information is now optional.

If I voluntarily report information that was previously required by the 2024 Final Rule but is now optional, will my basic models appear on the public CCMS database?

Yes. If you properly certify a basic model in accordance with new or amended standards, including some, all, or none of the optional reporting information, the basic model will appear on the public CCMS database. The optional reported information may also be made public in the CCMS database.

When do I have to stop using the 2024 templates?

DOE encourages use of the new templates immediately. However, DOE recognizes that certifiers currently may be preparing certifications using the 2024 templates. Accordingly, the 2024 templates may continue to be used, though DOE expects submitters to transition to the new templates as soon as practicable.