



September 6, 2013

Ms. Ann Bailey
United States Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Ave NW
Washington, DC 20460

Subject: Follow up Comments to ENERGY STAR's Most Efficient: Proposed 2014 Recognition Criteria

Dear Ms. Bailey,

On behalf of the Northwest Energy Efficiency Alliance (NEEA) and Sacramento Municipal Utility District (SMUD), we respectfully submit comments in regards to ENERGY STAR's Most Efficient (ME) 2014 criteria issued July 26th, 2013.

As organizations involved in supporting the introduction and commercialization of energy efficient products into the market, we support EPA's efforts to annually refresh the ME criteria. EPA's ME initiative can help accelerate market adoption of these super-efficient technologies by providing valuable product differentiation and recognition as the leading edge of efficiency. These super-efficient models will save US consumers and businesses substantial sums of money from reduced electricity bills. We feel strongly that a two-tier system, consisting of ENERGY STAR combined with the ENERGY STAR: Most Efficient designation, allows EPA to transform markets more rapidly than using the single ENERGY STAR label.

We strongly support EPA's ongoing efforts to integrate stakeholder needs into the ME planning process, and believe this type of collaboration is a model for future specification development.

As general supporters of energy efficiency and sponsors of utility incentive programs for a variety of plug loads and appliances, we work with market actors to help consumers become more informed about the benefits of purchasing energy-efficient products. For example, our TV programs have provided financial incentives and marketing support to encourage manufacturers and retailers to educate, promote and sell the most energy-efficient TVs on the market, including those that meet ME 2013 levels. Even in cases where we don't offer financial incentives for particular products, we recognize ENERGY STAR Most Efficient as a tool for promoting market transformation towards more efficient products. Thus, we have a strong interest in continuing to support the ME distinction and co-branding existing utility programs with EPA's ME initiative when possible.

1) We support EPA’s ongoing efforts to coordinate with energy efficiency program sponsors and encourage EPA to further incorporate ME into EPA’s broader Vision and Guiding Principles for the ENERGY STAR program.

We have been strong supporters of the ME initiative since it was first unveiled by EPA in 2010. We believe that the ME designation plays an important role in the commercialization process of energy efficient technologies, as seen in Figure 1 below. An annual ‘refresh’ of the ME criteria provides additional recognition for emerging technologies and assists them in bridging “The Chasm”. It is critical that EPA annually review the ME criteria that the ME designation continues to represent the Top 3-5% of products.

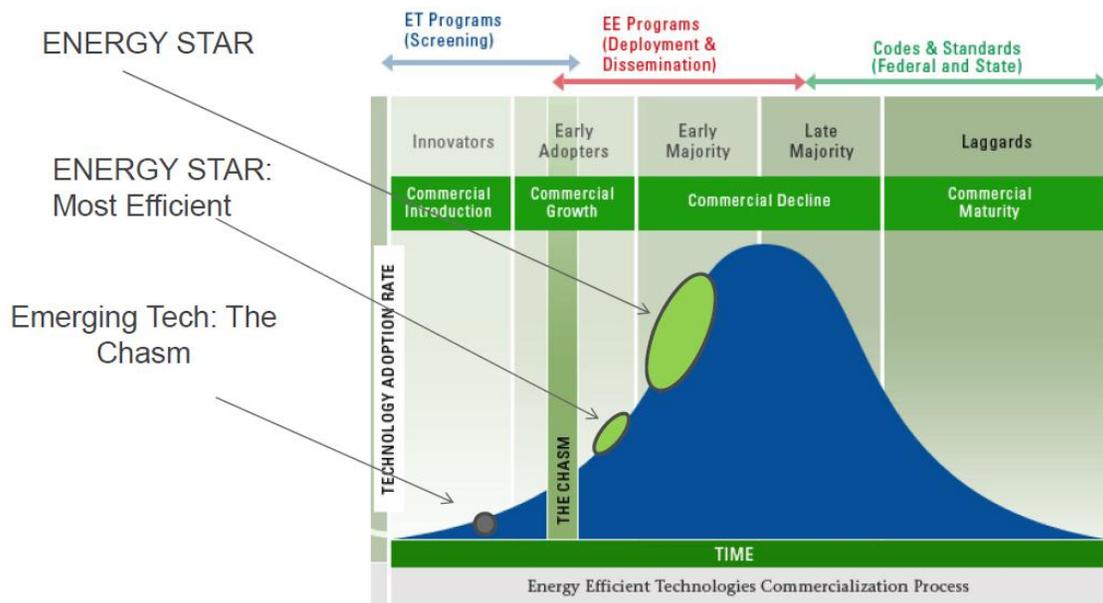


Figure 1: Energy Efficient Technologies Commercialization Process (Slide 5 from EPA’s ME 2014 Webinar)

In its ‘ME 2014’ cover letter, EPA highlighted its ongoing coordination with energy efficiency program sponsors interested in promoting early commercialization of energy efficient technologies. This coordination will become increasingly important as ME gains traction and becomes more widely integrated in efficiency programs.

As part of this effort, we encourage EPA to further integrate ME into their market transformation strategy by developing a more defined relationship between ENERGY STAR and ME. Furthermore, we recommend EPA facilitate a discussion among stakeholders to develop a roadmap for ENERGY STAR and ME designations so that stakeholders can better integrate ENERGY STAR into future program and product planning. Efficiency programs typically require at least one year of lead time to plan and roll out, and a roadmap of specification revisions or new product categories would be extremely helpful for planning purposes.

2) We encourage EPA to expand the Most Efficient designation to additional product categories.

During the ME 2014 webinar, EPA noted that due to lack of funding they did not investigate the possible expansion of ME to additional product categories. As ME gains traction and becomes a more integrated part of the ENERGY STAR program, it is important that EPA investigate expanding the ME designation for additional product categories that are well-suited for integration into existing and future incentive programs. These additional product categories will allow utility and efficiency organizations to further transform the market by developing programs around the ME criteria. We believe that expanding the ME designation to additional product categories should be a priority in the ME 2015 process. We recommend EPA coordinate with utilities and efficiency organizations to help EPA prioritize the additional products they consider for including in the ME 2015 criteria.

3) We acknowledge EPA's ongoing efforts to ensure correct usage of the ME signage, and encourage EPA to continue working with stakeholders as the ME program grows.

We support EPA's existing guidance on displaying ME signage¹ and encourage EPA to continue working with stakeholders as the ME program grows and gains broader acceptance. EPA states in its ME 2013 cover letter that the ME designation is intended for use at the point-of-sale and not to be applied by the manufacturer. As the ME program becomes increasingly integrated in utility program offerings, it will be critically important that retail sales staff and utility field service teams properly identify and place ME signage on qualified models only. We believe this effort to ensure appropriate placement of ME signage will reduce the potential for consumer confusion and strengthen the ME brand.

4) We support the proposed maximum On Mode power levels (P_{max}) and believe these levels are sufficiently stringent to distinguish the most efficient models available on the market. We strongly recommend that EPA take a forward-looking approach and account for forthcoming efficiency gains when developing future ME criteria. In addition, we recommend the EPA continue to monitor the penetration of emerging TV functionalities that may impact TV energy consumption.

In order to strengthen and sustain the ME brand, it is critical that the ME designation distinguish itself from the ENERGY STAR label by reflecting only the Top 3-5% of products on the market. Given the fast-paced nature of the consumer electronics market, there is potential for the ME brand to become diluted if it does not account for upcoming gains in efficiency. Therefore, we recommend EPA take a forward-looking approach when developing the ME criteria in future years. This will help strengthen the reputation of the Most Efficient brand.

¹ "Guidelines for using the ENERGY STAR Most Efficient Designation".
http://www.energystar.gov/ia/partners/downloads/Most_Efficient_2012_Guidelines.pdf

Based on our analysis of the proposed On Mode Power levels for ME 2013, we believe that these levels are sufficiently stringent and will identify the 'best in class' for a variety of screen sizes.

We recommend that EPA continue to monitor the penetration of Ultra HD, Smart TV, and other emerging TV functionalities which may impact TV energy consumption.

We appreciate your consideration for these comments and look forward to ongoing collaboration.

Sincerely,



Kelly Sanders
Senior Product Manager
Northwest Energy Efficiency Alliance



Jamie Cutlip
Program Planner
Sacramento Municipal Utility District