



July 27, 2007

Katharine Kaplan  
ENERGY STAR Marketing Manager  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Dear Katharine:

On behalf of CEE, I am submitting the following comments on the ENERGY STAR draft television specification. These comments were developed based on CEE Consumer Electronics Committee (Committee) discussion of the Draft 1 Version 3.0 ENERGY STAR Television Specification issued on June 29, 2007. Thank you for the chance to provide input on the draft specification. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

We believe that it is very important that the ENERGY STAR specification be set at a level high enough to generate significant energy savings and also be responsive to current sales trends. In order to more fully evaluate the potential savings, we urge EPA to distribute a market and technical analysis that identifies the per-unit and aggregate savings that would be generated by the proposed specification level. It is important that these data be available to us and other stakeholders in a sufficiently timely fashion to inform our review of the next draft of the specification.

In establishing the specification, we also encourage EPA to carefully evaluate market trends and set a level that is responsive to them. For example, if LCD televisions comprise the majority of new television purchases, it is important to ensure that the ENERGY STAR specification provides significant savings above and beyond that LCD baseline. By this, we do not mean to suggest a technology-specific approach. Our position continues to be that ENERGY STAR should establish technology-neutral specifications. If a particular technology is going to dominate this product category, the specification should take that into consideration and be set at a mark that generates energy savings for consumers.

In CEE's February 2007 letter, we commented on the subject of EPA's plan to allow for normalization for screen-size (e.g., watts per inch<sup>2</sup>). We would like to reemphasize and expand on those in our current comments.

Our chief concern is due to the fact that the spectrum of energy consumption for televisions appears to be so much wider than other ENERGY STAR categories. Thus, we believe the potential is greater for ENERGY STAR to be misunderstood. This is a particular concern given the current absence of U.S. EnergyGuide and Canadian EnerGuide labels for televisions and the consequent lack of television energy consumption information.

Although CEE does not currently have data on consumer television purchasing decisions, we urge EPA to bear in mind this potential for misunderstanding. We see at least three possible ways to address this situation. EPA might:

1. Continue your involvement in the current FTC EnergyGuide label revision process, and emphasize the importance of the expansion of the EnergyGuide label's scope to include televisions. CEE has also been involved in the process, consistently supporting such a scope expansion in all of our comment letters to date. We plan to alert the FTC to the ENERGY STAR revision process, and to remind them of the complementary effect of the EnergyGuide and ENERGY STAR labels in providing consumers with sufficient information to make energy-efficient purchasing decisions. Similarly, EPA might also encourage Canada to include televisions in the scope of its EnerGuide label.
2. Consider including absolute television energy consumption information on the ENERGY STAR label itself. This would be particularly useful should the scopes of the EnergyGuide and/or EnerGuide labels not be expanded to include televisions.
3. Consider setting a maximum energy use number, over which a product would not be eligible for ENERGY STAR qualification. We recognize this approach has larger implications across the ENERGY STAR brand.

Thank you again for the opportunity to comment. The Committee looks forward to continuing its participation in this specification revision process as it moves forward. If you have any questions about these comments, please direct them to Margie Lynch, CEE Program Manager, at (617) 589-3949 ext. 231.

Sincerely,



Marc Hoffman  
Executive Director

### **Supporting Organizations**

American Council for an Energy-Efficient Economy  
Natural Resources Canada  
Ontario Power Authority  
Pacific Gas & Electric  
Sacramento Municipal Utility District  
Wisconsin Focus on Energy  
Xcel Energy