



NRDC Comments on EPA's ENERGY STAR Most Efficient 2015 Proposed Criteria

September 11, 2014

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.4 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's proposed criteria for the Most Efficient 2015 label. NRDC has been a longtime supporter of the ENERGY STAR program and continues to strongly support the addition of the Most Efficient designation to the program. We are pleased to see the increasing harmonization between this program and specifications of the Consortium for Energy Efficiency (CEE). Most Efficient fills a much needed gap by allowing consumers to identify top performing products.

We offer the following general comments on the Most Efficient program and the proposed Most Efficient criteria for 2015.

General Comments on the Most Efficient Program

NRDC strongly supports the continuation of the Most Efficient program. The ENERGY STAR Most Efficient program fills an important role in identifying the best of the best products. The Most Efficient designation provides valuable information to early adopters of highly efficient products, who may be motivated by their environmental benefits. These early adopters play an important role in shifting markets towards greater efficiency and the Most Efficient label is an important tool to influence their purchasing decisions. We are particularly pleased to see that utility program use of the Most Efficient designation is increasing. We continue to strongly support the Most Efficient program and are encouraged by the progress it has made since the program's inception.

NRDC supports the annual updating of the Most Efficient criteria as appropriate. NRDC is pleased to see EPA's ongoing commitment to review the Most Efficient criteria annually. Having up to date specifications that continue to reflect the top of the market is important to develop and maintain the strength of the Most Efficient brand. As NRDC has commented in the past, EPA should continue to update the levels each year as appropriate to keep the specifications fresh. EPA should also continue to consider whether to add new products to the Most Efficient program as appropriate. NRDC supports the addition of dishwashers to the program. In future years, EPA should consider adding screw-based bulbs, computers, and room air conditioners to the program. NRDC would welcome additional discussion on the merits of including these additional product categories.

Comments on Proposed Specifications

NRDC generally supports the proposed criteria for the 2015 Most Efficient specification with the following specific comments.

Televisions

NRDC supports EPA's proposed levels for Most Efficient 2015 for televisions. This continues to be a fast moving product category, demonstrated by the fact that the number of television models meeting the 2014 specification has more than doubled since it was set. We support updating the specification to ensure that it reflects the best of the best and support the criteria proposed by EPA.

NRDC continues to urge EPA to closely monitor manufacturers' implementation of new features such as internet connected TVs to ensure they do not result in high levels of standby power that may not be accounted for in current test methods. As needed, EPA should address these new sources of energy use in their 2016 Most Efficient update and future revisions to the ENERGY STAR specification. Additionally, EPA should not provide any additional power allowance for ultrahigh definition televisions within the Most Efficient program at any point in the future. Such a power allowance would confuse consumers seeking the Most Efficient televisions on the market.

Monitors

NRDC supports the proposed update to the criteria for computer monitors. Given the growth in number of models qualifying from 2 percent to 9 percent, the specification should be updated so that it continues to reflect the top products on the market. NRDC supports the levels proposed which would continue to allow 5 percent of the market to qualify.

Windows

NRDC supports maintaining the Most Efficient criteria for windows at the 2014 levels for 2015. As submitted previously, we continue to encourage EPA to work with DOE on the next generation of reach specifications for windows, which could be the basis for future Most Efficient criteria. The current criteria were largely enabled by the DOE R-5 program. Greater levels of efficiency are still feasible and should be encouraged in the market through a similar reach program. We know that greater savings can be achieved based on the fact that NRDC ordered a set of R-7 windows for use in a demonstration project in the early 1990's and received them without any discount at a price that is cost effective.

Dishwashers

NRDC supports the inclusion of dishwashers in the Most Efficient program, given the availability of products that are more efficient than the base Energy Star levels and the consumer interest in efficiency in this product category. NRDC supports the proposed energy and water criteria of less than 240 kWh per year and 3.2 gallons/cycle, respectively. We strongly support the inclusion of a cleaning test requirement and would not support the addition of a Most Efficient specification for dishwashers without this

requirement. Maintaining performance is critical to consumer satisfaction with the Most Efficient program and poor performing products could damage both the Energy Star and Energy Star Most Efficient brand. We are concerned that the current proposed requirement of cleaning performance in the “heavy” test cycle alone is not sufficient. This cycle likely uses more energy and water than the “normal” cycle. If the dishwasher is only required to meet the cleaning requirement in this cycle, the consumer may not achieve the energy savings anticipated from the Most Efficient dishwasher if it does not achieve similar levels of performance in other cycles. We strongly encourage EPA to include a cleaning performance requirement in the normal cycle as well as the heavy cycle to ensure that consumers are achieving cleaning, energy, and water performance simultaneously. We also recommend that EPA require manufacturers to report the cycle time in each of the two modes so that EPA can collect this data. Cycle time is another key component of consumer utility and it would be valuable to have this information when considering future updates to the Most Efficient specification.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Meg Waltner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Meg Waltner
Manager, Building Energy Policy