

ENERGY STAR® Most Efficient 2015 Stakeholder Comments		
Topic	Comment Summary	EPA Response
General		
Most Efficient Program/CEE Coordination	Two stakeholders asked EPA to align its performance requirements with CEE's Tier 3 requirements (for HVAC and clothes washers). Alignment between CEE and ENERGY STAR Most Efficient at the CEE Tier 3 level will reduce confusion for many efficiency incentive programs around the nation.	The proposed ENERGY STAR Most Efficient clothes washer criteria align with CEE's Tier 2 requirements. ENERGY STAR Most Efficient seeks to recognize the best-of-the-best, while still offering a selection of products. EPA will continue to monitor innovations and work with stakeholders to assess whether aligning with CEE's Tier 3 might be possible in future ENERGY STAR Most Efficient clothes washer criteria revisions. EPA and CEE are also working together to align on the HVAC requirements, most recently, furnaces and boilers.
Most Efficient Design/ Management	Three stakeholders support the overall direction and purpose of the ENERGY STAR Most Efficient Program. They feel that a two-tier system, consisting of ENERGY STAR and the ENERGY STAR Most Efficient designation, allows EPA and its efficiency program partners to transform markets more rapidly than using the single ENERGY STAR label.	EPA appreciates this feedback and support.
	One stakeholder expressed support for the ENERGY STAR Most Efficient Program and annual updates, which are helpful to early adopters of highly efficient products who may be motivated by their environmental benefits.	EPA is committed to reviewing the ENERGY STAR Most Efficient requirements annually and revising when needed to highlight the best-of-the-best of ENERGY STAR and meet the needs of consumers who prioritize efficiency.
	Three stakeholders encouraged EPA to expand the scope of the ENERGY STAR Most Efficient program based on input from efficiency program sponsors. The three stakeholders recommend that EPA consider adding freezers, air cleaners, and room air conditioners as well any other product categories that EPA believes would benefit from the ENERGY STAR Most Efficient designation.	EPA proposes new products to be included in the ENERGY STAR Most Efficient portfolio when a clear additional efficiency opportunity (beyond ENERGY STAR) is evident, the market will support a higher tier, other factors are not present such as quality or performance concerns that cannot be guarded against, and when resources permit. EPA is pleased to announce the new dishwashers category for 2015 and will consider additional products next year. Further, building on the geo-targeted marketing completed in 2014, EPA will continue to focus on raising awareness of and support for ENERGY STAR Most Efficient in the coming year.
HVAC		
Timing for system status and messaging requirements	Two stakeholders noted that when EPA adds requirements that are not yet available in products on the market, manufacturers need more time between finalizing ENERGY STAR Most Efficient HVAC requirements and when they are effective. Manufacturers suggest finalizing requirements now for ENERGY STAR Most Efficient 2016.	EPA has adjusted the criteria to recognize advanced capabilities that are now available in the market.
Static Pressure Monitoring	One stakeholder contends that providing a signal from the blower fan that indicates static pressure after the installation may not correlate to the design static pressure and could confuse the installer or code official resulting in unintended consequences that impact the homeowner. The same stakeholder supports the system status and communication requirements outlined in items, A, C and D of the Proposed Criteria.	EPA has removed the external static pressuring monitoring element from the system status and messaging requirements. We look forward to continuing our discussion with stakeholders about the uses and risks.

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Recognition Criteria	Regarding central air conditioners and heat pumps performance metrics and furnace performance metrics, one stakeholder agrees with EPA's intent to retain the current minimum performance levels.	EPA appreciates this feedback and support.
Clothes Washers		
Scope	One stakeholder suggested EPA should include only one set of ENERGY STAR Most Efficient criteria, applicable to both top-loading and front-loading clothes washers. Front-loading washers are more efficient than top-loading washers, although both types of washers provide identical functionality to consumers with respect to washing their clothes.	Under the ENERGY STAR Most Efficient 2015 clothes washer criteria, top-loading and front-loading models will deliver the same annual energy use. The IMEF/IWF values are equivalent to the 2014 MEF/WF values and have been converted to IMEF and IWF using the appropriate DOE top-loading and front-loading crosswalk calculations.
Cleaning Performance	One stakeholder suggested that a minimum cleaning performance criteria is appropriate for the ENERGY STAR Most Efficient clothes washer program. If manufacturers make products that achieve efficiency by compromising on performance—for example, by washing clothes or dishes less thoroughly—consumers will come to value the ENERGY STAR brand less and will turn away from the most efficient, energy-saving products.	EPA is not including cleaning performance criteria in the ENERGY STAR Most Efficient 2015 clothes washer criteria. EPA will continue to evaluate the relationship between efficiency and cleaning performance to ensure that clothes washers deliver higher efficiency without compromising on performance and welcomes relevant stakeholder data to assist in this assessment.
Dishwashers		
Recognition Criteria	One stakeholder commented that EPA presented no data to support its conclusion that there is a higher risk of trade-offs between energy savings and cleaning performance at the levels it proposed.	The proposed cleaning performance criteria drew on the resources available during development of the ENERGY STAR Test Method for Determining Dishwasher Cleaning Performance (Rev. Feb – 2014). EPA has reviewed AHAM round robin data as well as data from DOE's Phase 3 testing (available at https://www.energystar.gov/products/spec/residential_dishwashers_specification_pd). For the revised proposal including levels for heavy, medium, and light, EPA also reviewed additional data made available by DOE.
	One stakeholder commented that the ENERGY STAR Most Efficient process is not sufficiently transparent, supported by data, consistent with EPA's Guiding Principles for the ENERGY STAR program, or consistent with actions it has taken with regard to its baseline specifications. EPA should also evaluate 1) whether significant energy savings can be realized on a national basis; 2) whether purchasers will recover their investment in increased energy efficiency within a reasonable period of time; and 3) whether the proposed levels can be achieved through one or more technologies.	By design, the ENERGY STAR Most Efficient initiative is a proving ground. Through ENERGY STAR Most Efficient, EPA aims to direct consumers to the best-of-the-best of ENERGY STAR, using as a foundation the in-depth engineering and market analysis completed in developing the ENERGY STAR product specifications, and then applying the best technical expertise to craft criteria that reasonably reflect the most efficient of ENERGY STAR. EPA leverages the expertise of others by then vetting the proposed criteria through our varied stakeholders. EPA relies on its partners to ground-truth levels and share feedback and data in response to proposals. The goal is for the final product to reflect EPA and stakeholders' collective best judgment.

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	<p>One stakeholder supports the proposed energy and water criteria of less than 240 kWh per year and 3.2 gallons/cycle respectively.</p>	<p>The proposed energy and water criteria for standard dishwashers, like the criteria for other ENERGY STAR Most Efficient product categories, were designed to reflect the performance of a limited set of products – the very best of ENERGY STAR – while still offering a varied selection of products and brands. The scatterplot shared on webinar slide 16 is the summary of this analysis. EPA is finalizing the ENERGY STAR Most Efficient 2015 dishwasher energy and water criteria as proposed.</p>
<p>Scope</p>	<p>One stakeholder is concerned with the process by which EPA excluded compact dishwashers and requested the rationale and data behind excluding those products.</p>	<p>Compact dishwashers are excluded from the proposed ENERGY STAR Most Efficient 2015 dishwasher criteria due to a lack of indication that greater efficiency beyond the ENERGY STAR levels exist at this time. Market analysis and manufacturer outreach suggest that today's countertop models have an energy consumption of 220 kWh/year and water consumption of 3.5 gallons/cycle; in other words, they are less efficient than the levels set out in draft 2 of the Version 6.0 ENERGY STAR specification (see the June 17, 2014 data and analysis package). Additionally, due to the low market share for compacts, EPA is not aware of any stakeholder interest in promoting them as an ENERGY STAR Most Efficient product category. While there is not currently a best-of-the-best to recognize for compacts, EPA looks forward to staying abreast of the latest innovations and would consider any such data that stakeholders may be able to share regarding potential future inclusion of compacts in the ENERGY STAR Most Efficient portfolio.</p>
	<p>Four stakeholders support EPA's addition of the dishwashers product category.</p>	<p>EPA welcomes the opportunity to recognize the best-of-the-best among ENERGY STAR dishwashers.</p>
<p>Cycle Time</p>	<p>One stakeholder recommended the addition of a reporting requirement for cycle time, in the interest of providing information to consumers.</p>	<p>EPA is not pursuing cycle time reporting at this time.</p>

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Dishwasher Cleaning Performance	<p>Two stakeholders emphasized the importance of maintaining performance and consumer satisfaction in Most Efficient requirements. Poor performing products could damage both ENERGY STAR and ENERGY STAR Most Efficient. Two stakeholders suggested the current proposed requirement of cleaning performance in the “heavy” test cycle alone is not sufficient, as it may not be representative of typical performance.</p>	<p>EPA proposed to include cleaning performance criteria in the finalized 2015 ENERGY STAR Most Efficient Dishwasher requirements. EPA originally proposed a heavy cycle threshold only, as this is the soil condition most likely to present a cleaning performance issue. To guard against the potential for unacceptable performance in the cycles that consumers use more frequently, EPA is now proposing floors for all three test cycles: heavy, medium and light.</p>
	<p>One stakeholder expressed concern about the proposed minimum dishwasher cleaning performance criterion and requested more data to support 1) the proposed required minimum score of 70; or 2) the decision to evaluate cleaning performance based only on the heavy cycle.</p>	<p>The proposed cleaning performance criteria draw on the resources available during development of the ENERGY STAR Test Method for Determining Dishwasher Cleaning Performance (Rev. Feb – 2014). We have reviewed AHAM round robin data, as well as data from DOE’s Phase 3 testing (available at https://www.energystar.gov/products/spec/residential_dishwashers_specification_pd). During development of the ENERGY STAR Most Efficient criteria, EPA received stakeholder feedback indicating that a heavy cycle floor of 70 is a reasonable starting place. In proposing use of the heavy cycle and a floor of 70, EPA sought to test this approach with stakeholders. In response to comments and additional data, EPA proposed a revised approach including cleaning performance floors for heavy, medium, and light test cycles.</p>
	<p>One stakeholder expressed concern about the repeatability and reproducibility of the test method used to determine cleaning performance, and sought clarity on verification testing.</p>	<p>EPA believes use of the ENERGY STAR Test Method for Determining Residential Dishwasher Cleaning Performance (Rev. Feb-2014) in reporting and determining cleaning performance for the ENERGY STAR Most Efficient requirements, will allow the program to more accurately consider cleaning performance in relation to energy and water use, assist in identifying potential issues with the test method, and will allow test labs to gain more familiarity with the ENERGY STAR Cleaning Performance Test Method. In the revised proposal, EPA is clarifying that the Cleaning Index for each test cycle - heavy, medium, and light - will be the average of the units in the sample. Cleaning performance is not subject to verification testing.</p>

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Test Method	One stakeholder expressed concern about the repeatability and reproducibility of the test method used to determine cleaning performance and sought clarity on how EPA might account for variation.	EPA believes use of the ENERGY STAR Test Method for Determining Residential Dishwasher Cleaning Performance (Rev. Feb-2014) in reporting and determining cleaning performance for the ENERGY STAR Most Efficient requirements will allow the program to more accurately consider cleaning performance in relation to energy and water use, assist in identifying potential issues with the test method, and will allow test labs to gain more familiarity with the ENERGY STAR Cleaning Performance Test Method. In the revised proposal, EPA is clarifying that cleaning performance shall be determined using the same sampling plan as that used to determine energy and water performance. The Cleaning Index for each test cycle - heavy, medium, and light - will be the average of the units in the sample.
Televisions		
Recognition Criteria	Three stakeholders suggested EPA relax the proposed criteria for screen sizes less than 50" by 15%. This will allow additional models to qualify while resulting in a minimal increase (3-6 Watts) in overall product power requirements.	EPA reviewed the market availability of products to ensure that models meeting the proposed ENERGY STAR Most Efficient 2015 criteria are available to consumers. EPA found that of the products that can meet the proposed criteria, many were introduced in late Spring 2014, which may account for why they have not shown up in certain sales data. Nonetheless, based on multiple stakeholders' feedback with concerns over product availability, EPA has relaxed the ENERGY STAR Most Efficient 2015 criteria modestly.
	One stakeholder supports EPA's proposed levels for ENERGY STAR Most Efficient 2015 for televisions with a few suggestions: EPA should closely monitor new features such as internet connected TVs for high levels of standby power. Additionally, EPA should not provide any additional power allowance for Ultra High Definition televisions within the ENERGY STAR Most Efficient program at any point in the future. Such a power allowance would confuse consumers seeking the most efficient televisions on the market.	EPA continues to monitor implementation of features such as internet connected TVs and how they affect standby power. To this end, EPA is currently addressing these features and their energy use in the current ENERGY STAR Television Version 7.0 specification revision process. At this time, under ENERGY STAR Most Efficient 2015, EPA is not providing an additional power allowance for Ultra High Definition TVs. EPA will continue to monitor the marketplace and will evaluate the potential for ENERGY STAR Most Efficient to apply to UHD TVs in the future.

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	<p>One stakeholder noted that the ENERGY STAR TVs Version 7.0 Draft 2 requirement is based on a revised qualified product dataset, which resulted in a higher Maximum On Mode Power requirement. This same revised dataset should be used to develop the ENERGY STAR Most Efficient 2015 qualifying criteria. Additionally, TVs with a 50" screen size or above should be included in the ENERGY STAR Most Efficient Program as they will continue to be highly popular with customers, who would benefit from the program's guidance in making an informed purchase.</p>	<p>EPA has evaluated the proposed ENERGY STAR Most Efficient 2015 criteria against the most current CEC dataset, which reflects TV's power consumption as tested to the DOE Final Rule test procedure. Then, EPA again evaluated the criteria against its dataset of ENERGY STAR certified products. In response to concerns about availability of products that meet the proposed criteria, EPA did find a smaller than desired selection at some sizes that EPA understands is most attractive to consumers presently. As such, EPA has relaxed the ENERGY STAR Most Efficient 2015 criteria modestly.</p>
Monitors		
Recognition Criteria	<p>One stakeholder supports the levels proposed for computer monitors, which would allow 5 percent of the market to qualify. (The qualification rate had grown from 2% to 9% in 2014)</p>	<p>EPA appreciates this feedback and support.</p>
Windows		
General	<p>One stakeholder requested that EPA keep the ENERGY STAR Most Efficient criteria for windows "simple and affordable."</p>	<p>EPA has worked to simplify the ENERGY STAR Most Efficient specification for windows by using one u-factor for all zones and SHGC levels that match the base ENERGY STAR criteria for 3 out of the 4 zones. EPA has also strived to limit the burden on manufacturers in applying for recognition. EPA believes this has maintained program participation attainability. The ENERGY STAR Most Efficient program recognizes the best-of-the-best of ENERGY STAR when it comes to efficiency and innovation-prioritizing these qualities above all else.</p>
Scope	<p>One stakeholder encourages EPA to collaborate with DOE on the next generation of reach specifications for windows, which could be the basis for future Most Efficient Criteria. The stakeholder referenced DOE's R-5 Window Volume Purchase Program as an example of a reach specification. The stakeholder contends that greater levels of efficiency are feasible and cost-effective, specifically mentioning R-7 windows.</p>	<p>EPA will continue to do research and collaborate with DOE, industry, and industry stakeholders to consider the next specification for the ENERGY STAR Most Efficient windows.</p>
	<p>One stakeholder commented that the continued exclusion of skylights presents a unique product bias at the consumer level. The stakeholder contends that applying the ENERGY STAR Most Efficient label to one daylighting product category but not others creates the impression that other product manufacturers are not capable of producing and marketing products that meet the aggressive ENERGY STAR Most Efficient criteria. The stakeholder also notes that highly efficient skylights are currently available and ENERGY STAR should take steps to include these products in the ENERGY STAR Most Efficient Program.</p>	<p>EPA understands that skylight products with lower U-factors are available in the market. However, EPA's market and energy analysis in the Version 6.0 Criteria and Analysis Report made it clear that skylights do not have a big impact on overall energy use in a home even at the more aggressive criteria EPA proposed. If skylight manufacturers or interested stakeholders would like to provide detailed data, analysis, and a proposal to make more clear the consumer value and identify the top performers in that category, EPA would be happy to discuss ideas and suggestions.</p>