

09 Oct 2012



Ms. Amanda Stevens
Product Manager, ENERGY STAR® for Appliances
Office of Air and Radiation
U.S. Environmental Protection Agency
Washington, DC 20460

Re: Best Buy Co., Inc. comments on Draft 3, Version 5.0 ENERGY STAR TV Specification for Residential Refrigerators & Freezers

Dear Ms. Stevens:

We are writing to submit comments on EPA's ENERGY STAR Draft 3, Version 5.0 Refrigerator & Freezer standard on behalf of Best Buy Co., Inc. (NYSE: BBY), a leading multi-channel global retailer and developer of technology products and services. Every day our employees - 170,000 strong - are committed to helping deliver the technology solutions that enable easy access to people, knowledge, ideas and fun. We are keenly aware of our role and impact on the world, and we are committed to developing and implementing business strategies that bring sustainable technology solutions to our consumers and communities. For information about Best Buy, visit www.bestbuy.com. We offer the following detailed comments intended to strengthen the ENERGY STAR label and help electronics consumers in making sound product selections.

Regarding the proposed effective date for the standard, Best Buy supports EPA's compromise date of 01 Mar 2014 based on the following observations:

- From EPA data, we know that overall ENERGY STAR refrigerator market share exceeded 55% in 2011 and continued growth is expected.
- Best Buy's sale of ENERGY STAR certified refrigerators was 76.69% of our total category unit sales in 2011.

As we look back to the market's reaction just prior to the ENERGY STAR Television 4.1 standard going live, we saw websites such as C-Net make statements such as "ENERGY STAR no longer matters with televisions." This was a reaction to a very high percentage of the market meeting the existing ENERGY STAR standard. We cannot afford a similar market reaction for the already high percentage of ENERGY STAR certified refrigerators.

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Additionally, we urge the EPA to collaborate with the FTC in an effort to expedite the rulemaking process for the EnergyGuide revision. Our preference is to keep the March 2014 effective date as a priority over harmonizing test procedures with the EnergyGuide as we do not believe a short-term difference in energy test procedure between the EnergyGuide and ENERGY STAR will present any confusion in the market.

Sincerely,

A handwritten signature in black ink, appearing to read "Thad Carlson", with a long horizontal flourish extending to the right.

Thad Carlson
Sr. Manager, Environmental Sustainability