

December 31, 2011

Ms. Ann Bailey  
ENERGY STAR Product Labeling  
US Environmental Protection Agency  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue, NW  
Washington D.C. 20460

Dear Ms. Bailey:

The Consortium for Energy Efficiency (CEE) would like to thank you for continuing to consult with stakeholders on how to responsibly expand ENERGY STAR® to promote super efficient products. Consortium members have invested hundreds of millions of dollars supporting the ENERGY STAR brand as the marketing platform for energy efficiency, and we look forward to further utilizing investments to serve ever-increasing energy savings objectives. The membership has integrated ENERGY STAR as a foundational element in local efforts to drive mass market increases in efficiency. Traditionally, individual members have elected to further distinguish products that exceed the minimum performance levels that define ENERGY STAR. In many cases the basis for further distinction have been CEE performance tiers, established through a particular process, and for a particular purpose, specific to the relevant product category. In such cases, CEE did not elect to create a national market identity or label; rather, CEE recognized local and regional differences, as well as other factors, and encouraged financial incentives to differentiate performance as appropriate to the individual program.

We welcome an ENERGY STAR Program enhancement to increase overall savings and look forward to helping make this a reality. We are unified in our interest to protect the equity and credibility of ENERGY STAR and are ready to meet the leadership challenge of making this new component effective for our shared purpose.

We appreciate the EPA invitation to comment on the proposal to extend the pilot phase of ENERGY STAR Most Efficient into 2012. For more than 15 years, CEE members have worked with industry to develop tiered specifications for super efficiency. Below, based on these past experiences, please find our suggestions for piloting Most Efficient in 2012. We look forward to

working with EPA and DOE to build even greater demand for the most efficient ENERGY STAR products.

### **CEE Continues to Support Many Aspects of the Most Efficient Pilot**

Per our previous comments, CEE supports a federal program for super efficiency that is predictable, recognizes key differences in the markets for eligible products, and yields significant energy savings above the existing ENERGY STAR requirements. We believe Most Efficient could play a valuable role in supporting local efforts to promote super efficiency to early adopters if the recognition of the ENERGY STAR brand can be linked with the financial incentives, education, and marketing offered by local programs for super efficiency. If structured in consultation with CEE members, Most Efficient could be an effective means to accelerate the introduction of higher performance products—particularly in markets with a high penetration of ENERGY STAR products.

### **CEE Supports Proposed Product-related Changes**

Regarding the substantive changes EPA has proposed for the Most Efficient pilot in 2012 (e.g., adding boilers, increasing the stringency of television performance, and easing the requirements for refrigerators), CEE concludes these changes are consistent with the stated objective of Most Efficient, and prudent in order to continue testing the effectiveness of this new program element in the 2012 pilot.

### **Extending the Pilot into 2012 is Appropriate**

The timing of introduction of Most Efficient in 2011 reduced uptake in local programs, as it was too late for most organizations to change their 2011 programs to incorporate new elements such as Most Efficient. Extending the pilot phase into 2012 will enable additional programs to have an opportunity to assess and incorporate Most Efficient into their promotional efforts on a trial basis. CEE appreciates the careful approach EPA is taking to test the effect of Most Efficient on ENERGY STAR, and looks forward to an engaging stakeholder discussion once results are collected and shared. It's our hope that going forward Most Efficient will be rolled out in a manner that takes into account the existing messaging and incentives currently offered by CEE Members and other stakeholders in the market, and provides sufficient lead time for incorporation into local programs.

### **CEE Stands Willing to Partner with EPA to Help Mitigate Risk to the ENERGY STAR Brand**

We appreciate the steps EPA has taken to minimize risk when scoping a differentiated component of the ENERGY STAR brand. As Most Efficient moves forward, we believe that a strong technical foundation in support of its represented meaning is paramount to the ENERGY STAR brand's success. To ensure the brand continues to live up to expectations, and to afford the ability to take corrective action should its prominence diminish, we recommend that EPA monitor and report against metrics that speak to brand integrity and savings impacts. CEE

members are eager to partner with EPA to assist in identifying such metrics, assessing such information, and assisting in corrective actions if and when necessary.

CEE is committed to working with EPA and DOE towards the successful roll out of Most Efficient. We look forward to ongoing consultation with you in the coming months. Please contact John Taylor, CEE ENERGY STAR Liaison, with any questions regarding these comments or for additional information.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski".

Edward Wisniewski  
Executive Director