

Responses to Comments on ENERGY STAR® Most Efficient 2013 Proposed Recognition Criteria

General Topics	
Stakeholder Comments Summary	U.S. Environmental Protection Agency (EPA) Response
<p>Several stakeholders, including several energy efficiency program sponsors, expressed strong support for the permanent inclusion of the Most Efficient designation in the ENERGY STAR Program noting that it:</p> <ul style="list-style-type: none"> - Allows consumers to identify top performing products; - Ensures that the criteria stay fresh and meaningful with a yearly designation; - Plays an important role in the commercialization process of energy efficient technologies; and - Provides the assurance for stakeholder investment. <p>The energy efficiency program sponsors encouraged EPA to further incorporate Most Efficient into a broader strategy of market transformation and to carefully consider stakeholder coordination to ensure that the new level does not cause consumer confusion.</p>	<p>EPA appreciates this support for the decision to make ENERGY STAR Most Efficient a permanent segment of the ENERGY STAR program. With this decision, EPA commits to developing a national public awareness strategy including effective consumer messaging for partners and retail sales associate training. EPA will also work closely with partners to support their own marketing and communications strategies.</p>
<p>Several energy efficiency program sponsors noted that the Most Efficient designation appears not to cause consumer confusion based on the preliminary results of the pilot program evaluation. These stakeholders suggested that EPA continue to monitor consumer awareness and understanding as Most Efficient becomes more widely adopted. Another stakeholder suggested that EPA begin to collect and track sales data (at minimum two to three yearly quarters) for products recognized as ENERGY STAR Most Efficient to better assess whether criteria need to be revised.</p> <p>Two other stakeholders commented that while the evaluation released in September has some interesting insights, it only targeted the limited number of existing program participants and therefore a more robust justification for the program is necessary. One of these stakeholders continues to be concerned that the Most Efficient program will dilute the ENERGY STAR brand, and otherwise serve to undermine the investment that manufacturers have made in developing and promoting ENERGY STAR products generally.</p>	<p>EPA will monitor consumer awareness using the CEE Household Awareness Survey and other methods as determined helpful by the communication strategy under development now. In these early years of the ENERGY STAR Most Efficient pilot, EPA will track product count as well as innovations in technology to determine when it is time to change the recognition criteria. EPA's evaluation of the ENERGY STAR Most Efficient relied heavily on ENERGY STAR certified product data, retail store level assessments, and the CEE Household Awareness Survey. Discussions with some early participants in the pilot played a role in the evaluation as well. Based on the combined findings from all of the above sources, EPA determined that the Most Efficient pilot was delivering on its goal of accelerating the availability of efficient products in the market without denigrating the ENERGY STAR brand. EPA is committed to working closely with partners to support marketing and communications strategies that enhance the value of both ENERGY STAR and ENERGY STAR Most Efficient.</p>

Responses to Comments on ENERGY STAR® Most Efficient 2013 Proposed Recognition Criteria

General Topics	
Stakeholder Comments Summary	U.S. Environmental Protection Agency (EPA) Response
<p>Several energy efficiency program sponsors commended EPA's efforts to release the ME 2013 criteria in September so that EEPS were able to incorporate the 2013 levels into the 2013 program offering. They suggested that EPA release future Most Efficient criteria and detailed data supporting technical and market rationale at least six months prior to the launch to help ensure that the EEPS can receive regulatory approval in time. These energy efficiency program sponsors further encouraged EPA to coordinate future efforts through the Consortium for Energy Efficiency and to develop a road map for both future ENERGY STAR and Most Efficient so that they can be incorporated into the long-term utility program planning process.</p> <p>A second stakeholder also suggested that EPA consider setting Most Efficient targets for future years (or coordinating reach targets with DOE) to incent the manufacture of even more efficient products. The U.S. Department of Energy's volume purchase programs, such as the R-5 windows specification and the Rooftop Unit Challenge are both successful examples of reach specifications. The stakeholder does not have a firm opinion at this point on whether these reach targets should be explicitly part of the Most Efficient program or should just be utilized by the Most Efficient program when available (such as the DOE R-5 windows program) and developed in coordination with DOE.</p>	<p>EPA will continue to strive to release the ENERGY STAR Most Efficient criteria earlier in the calendar year in recognition of program sponsor planning cycles. EPA is balancing the need to base criteria decisions on data reflecting the performance of products in the coming year with the desire to provide certainty regarding the forthcoming criteria as early as possible. EPA is committed to re-doubling its efforts to engage with efficiency program sponsors on plans for ENERGY STAR and ENERGY STAR Most Efficient. EPA will continue to evaluate the potential for harmonization with existing criteria that meet the Most Efficient principles when considering eligibility criteria for ENERGY STAR Most Efficient.</p>
<p>One stakeholder recommended that EPA consider the following product categories for addition to the ENERGY STAR Most Efficient Program:</p> <ul style="list-style-type: none"> - Screw-based bulbs: Establish more stringent requirements for efficiency and lifetime that set a national "reach" target for manufacturers to design to and for utility programs seeking to achieve greater savings via their rebate programs. EPA would need to decide whether to keep the criteria technology neutral or whether to have separate specs for CFLs and LEDs, and whether to have specifications for omnidirectional and/or directional bulbs. - Room Air Conditioners: Set the Most Efficient criteria at a minimum EER of 11.7, to correspond with units that save at least 20 percent beyond the federal standard. There are seven models in the ENERGY STAR qualified product list that meet this level, from two manufacturers. The stakeholder noted that it is difficult for utilities to have rebate programs for room air conditioners as they are "optional" appliances, making further consumer information tools, such as Most Efficient even more important. - Computers: Due to a high rate of technological progress, innovation in the consumer electronics industry, strong mobility and battery life market drivers, computer efficiency is continuing to increase rapidly leading ENERGY STAR computer specifications to be outdated and making it difficult for utilities to use the specifications for incentive programs. Given the time required to update specifications and the 9-month period before they become effective, the stakeholder commented that a Most Efficient program would continue to drive energy efficiency improvement and support utility programs during those periods when the qualification rate for ENERGY STAR far exceeds 25 percent. 	<p>EPA identifies new product categories for inclusion in the ENERGY STAR Most Efficient portfolio based on the category's fit with the principles of the program. These principles are:</p> <ul style="list-style-type: none"> - Recognize performance that is truly exceptional; aspirational; leading edge (i.e., consistent with the interests of early adopters) - No compromise in performance - More than one manufacturer - Structure so that recognized products deliver top performance regardless of geography/climate - Not necessarily available for all configurations or in the largest sizes <p>EPA will review all of the suggested product categories for fit with these principles when completing analysis in support of proposed ENERGY STAR Most Efficient 2014 criteria.</p>

Responses to Comments on ENERGY STAR® Most Efficient 2013 Proposed Recognition Criteria

General Topics	
Stakeholder Comments Summary	U.S. Environmental Protection Agency (EPA) Response
<p>Several energy efficiency program sponsors acknowledged EPA’s ongoing efforts to promote Most Efficient and encouraged EPA to continue working with stakeholders to identify the most effective promotion strategy for recognized products. They noted that in some cases utility partners may be able to provide signage assistance in the short term but that it may be challenging for multi-tiered incentive programs since the added complexity to distinguish between tiers may not fit within their market strategy. Thus, these stakeholders suggested that EPA work with retailers to incorporate Most Efficient signage in their online marketing efforts which could help make the public more aware of the distinction.</p>	<p>EPA will work with retailers as well as other interested stakeholder to support a variety of ENERGY STAR Most Efficient outreach, including online marketing efforts. EPA is also developing a strategy to raise public awareness nationally.</p>
<p>One stakeholder commented that designation as a program participant should not be automatic, and, rather, stakeholder partners should be able to elect whether program participation (even if they have qualified products) is worthwhile. The stakeholder further noted that once the program is shown to provide value to consumers and other stakeholders, participation will likely increase, but, until that time, the designation should be voluntary.</p>	<p>EPA highlights products meeting the Most Efficient criteria on the ENERGY STAR website for the benefit of consumers. Streamlining the process by which these lists are generated is a way to reduce burden. Taking this step is not intended to force participation in the program.</p>