

ENERGY STAR Most Efficient 2012 Proposal: General Stakeholder Comments and EPA Responses

Comment	EPA Response
<p>One industry group expressed support for EPA and the Department of Energy (DOE)'s efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement noting that its members have demonstrated their continuous commitment to bringing the most efficient products possible to market. The industry group stated, however, that the impact of the "Most Efficient" program within ENERGY STAR must be carefully considered. In particular, the stakeholder noted that there are issues with respect to refrigerator-freezers that require further consideration and resolution.</p>	<p>EPA agrees that potential introduction of a new ENERGY STAR designation requires careful consideration and evaluation. As such, EPA is continuing to pilot ENERGY STAR Most Efficient through 2012 and will launch an evaluation later this year.</p>
<p>One stakeholder expressed strong support for the addition of the Most Efficient designation, noting that ENERGY STAR Most Efficient fills a much needed gap by allowing consumers to identify top performing products. This stakeholder also expressed support for the extension of the pilot for an additional year and urged EPA to make the Most Efficient designation a permanent part of the ENERGY STAR program.</p>	<p>Thank you for this support.</p>
<p>One stakeholder commented that before a large marketing investment can be made nationwide, more consumer research and/or a smaller scale pilot is needed to better understand whether or not the ENERGY STAR brand we have all worked so hard to build will be diluted. To that end, the stakeholder stated that EPA should continue to study the effectiveness of the Most Effective pilot program in delivering energy savings and value to consumers. To justify the continuation of this program, EPA should provide demonstrable evidence that the benefits outweigh the concerns noted above.</p>	<p>EPA agrees that potential introduction of a new ENERGY STAR designation requires careful consideration and evaluation. EPA will launch an evaluation later this year.</p>
<p>One stakeholder reiterated their concern that the Most Efficient designation will dilute the ENERGY STAR brand. Regulators, manufacturers, retailers and consumers have all devoted substantial time, money and effort toward the promotion and adoption of the ENERGY STAR program. ENERGY STAR has become a recognized brand among consumers, giving them confidence that the qualified appliances they buy will operate efficiently and cost-effectively. The stakeholder expressed concerned that the Most Efficient designation may cause confusion among consumers and lead them to believe that the ENERGY STAR designation has either been supplanted or is somehow less valuable than before.</p>	<p>EPA takes seriously the health of the ENERGY STAR brand, built over the last 20 years with public and partner investment. These considerations were fundamental in the design of the pilot. EPA is aiming to strike the right balance between delivering on a consumer interest and efficiency program sponsor need and preserving the ENERGY STAR brand in the market. The utility versus potential harm of the Most Efficient designation will be a focus of the pilot evaluation planned for later this year.</p>

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<p>One stakeholder commented that the proposed Most Efficient 2012 program is not in line with the fundamental ENERGY STAR guiding principle of “making it easy for consumers to identify and purchase energy-efficient products that offer savings on energy bills without sacrificing performance, features, and comfort.”</p>	<p>EPA believes that the current approach to the ENERGY STAR Most Efficient pilot does, for a set of early adopter consumers and energy efficiency program sponsors, do just that-make it easy for them to identify the most energy efficient of the ENERGY STAR certified products. By creating a special designation, limiting its use to point of sale applications and hosting a separate ENERGY STAR Most Efficient product web listing, EPA believes it is reducing the risk of consumer confusion. During the course of the pilot, the Agency will seek more information from pilot participants regarding consumer understanding.</p>
<p>One stakeholder commented that EPA should keep participation in this program voluntary and not provide for automatic product designation, as, depending on the observed utility of the pilot program, manufacturers may elect whether or not to participate.</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>
<p>One stakeholder noted that there is confusion in the market place on the difference between CEE Tier levels and “Most Efficient.”</p>	<p>Although both are tools for designating the most efficient of product groupings, the ENERGY STAR Most Efficient designation is designed to be a consumer facing sub-component of the ENERGY STAR brand. In contrast, EPA understands the CEE Tiers to be tools for program administrators.</p>

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<p>In its 'Most Efficient (ME) 2012' cover letter, EPA highlighted the strong support from utilities "interested in differentiating among ENERGY STAR qualifying products" and the potential to build utility programs around the ME criteria. Four energy efficiency program sponsor stakeholders support and welcome EPA's efforts to co-brand its ME initiative with local utility programs.</p> <p>As part of their annual program planning process, program managers notify retailers of the coming year's qualifying levels by early Fall so that retailers can make appropriate stocking decisions. These 2012 program criteria have already been finalized and communicated to retailers, and therefore these stakeholders encourage EPA to align ME 2012 performance criteria with existing utility efforts. This approach will help to maintain clear and consistent messaging to consumers—an essential element for a successful program roll-out. To strengthen future co-branding efforts in 2013 and beyond, the stakeholders encourage EPA to work with stakeholders to develop a road map for future ME specifications so that they can be incorporated into the utility program planning process.</p> <p>These stakeholder's utility-sponsored electronics programs also include specially designed point of purchase materials, which indicate whether a TV meets certain required performance levels. These materials and their corresponding performance levels have been carefully designed to maintain a consistent and accurate message of product efficiency. Point-of-purchase material for some utility partners already is labeled 'Most Efficient', which creates the potential for customer confusion if EPA's 'Most Efficient 2012' criteria are not aligned with existing programs.</p>	<p>EPA appreciates these comments that speak to maximizing the effectiveness of the ENERGY STAR Most Efficient designation with efficiency program sponsors. EPA too sees the value of harmonizing with existing programs when possible. While EPA did evaluate the viability of harmonizing the Most Efficient 2012 eligibility criteria with that of existing programs with overlapping product mixes, EPA was not able to adopt existing program requirements and stay true to the goals of the Most Efficient pilot. Should EPA carry this pilot forward, EPA will aim for an earlier release of recognition criteria and continue to work to promote harmonization with other programs.</p>

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<p>One stakeholder recommends that EPA consider adding additional product categories to the Most Efficient program as it develops. In particular, the stakeholder recommends that EPA consider adding a Most Efficient designation for screw-based bulbs. The EPA is currently revising its specification for CFL and LED light bulbs. The approach being used by EPA is to set relatively modest efficiency requirements and to focus on attributes tied to consumer satisfaction such as color quality, run-up time, lumen maintenance and dimmability. The stakeholder agrees with this philosophy given the fact that only 25% or so of current sockets have an efficient bulb in them and that this is largely due to consumer concerns about the aforementioned performance issues. The way to get consumers to switch to more efficient bulbs for these other sockets is to provide them with a bulb they will like. EPA has proposed efficiency levels and lamp lifetimes that the vast majority of efficient bulbs on the market can meet.</p> <p>To establish a national “reach” target for manufacturers to design to and for utility programs seeking to achieve greater savings via their rebate programs, the stakeholder would like to see EPA add screw based light bulbs to its Most Efficient labeling program. This Most Efficient specification would build off the ENERGY STAR specification and add more stringent requirements for efficiency and lifetime. Should EPA choose to pursue this further it will need to decide whether to keep the specification technology neutral or whether to have separate specifications for CFLs and LEDs, and whether to have specs for omnidirectional and/or directional bulbs.</p>	<p>Should EPA carry the ENERGY STAR Most Efficient beyond a pilot phase, the Agency will keep this input in mind.</p>