



December 15, 2011

Ms. Ann Bailey
United States Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Ave NW
Washington, DC 20460

Subject: Follow up Comments to ENERGY STAR's Most Efficient: Proposed 2012 Recognition Criteria for Televisions

Dear Ms. Bailey,

On behalf of the Northwest Energy Efficiency Alliance (NEEA) and Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric (SDG&E), and Sacramento Municipal Utility District (SMUD), we respectfully submit comments in regards to ENERGY STAR's Most Efficient 2012 criteria issued November 29, 2011. While the Most Efficient 2012 criteria includes six separate product categories, our comments focus specifically on televisions.

As organizations involved in midstream incentive programs for TVs, we support EPA's efforts to establish a 'Most Efficient 2012' (ME 2012) specification for televisions, which designate products as some of the most efficient TVs on the market. In addition, we strongly recommend that EPA align ME criteria with existing utility incentive programs. This provides an opportunity for strong co-branding and maximizes program effectiveness by maintaining a clear and consistent message to its target audience.

As sponsors of utility incentive programs for TVs, we work with retailers and manufacturers to help consumers become more informed about the benefits of purchasing energy-efficient TVs. The Program provides financial incentives and marketing support to encourage manufacturers and retailers to educate, promote and sell the most energy-efficient TVs on the market. Similar to EPA's Most Efficient initiative, the Program promotes products that meet and exceed existing ENERGY STAR specification levels. Thus, we have a strong interest in supporting ME 2012 and potentially co-branding existing utility programs with EPA's Most Efficient initiative.

We have seen rapid market adoption of efficient TV technology in part due to the decreasing costs of LED technology. Developments in TV technology, such as the recent

announcement by LG Electronics of a 47-inch LCD TV panel that claims to use only 28 W in Active mode vs. over 90 W for current best-in-class models¹, suggest that there remains a large opportunity for energy efficiency improvements in TVs. Utility incentive programs and EPA's Most Efficient program have critical roles to play to ensure rapid market adoption of these super-efficient technologies by providing valuable product differentiation and recognition as the leading edge of efficiency. These super-efficient models will save US consumers and businesses substantial sums of money from reduced electricity bills.

1) We urge EPA to align its 'Most Efficient' messaging and performance levels with existing utility programs so that the process is streamlined and clear for all stakeholders.

In its 'Most Efficient 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. We support and welcome EPA's efforts to co-brand its ME initiative with local utility programs.

As part of our 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 we encourage EPA to align ME 2012 performance criteria with existing utility efforts. This 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, we 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.

Our utility-sponsored electronics programs also include specially designed point of purchase materials (see below), 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. As Figure 1 demonstrates, POP material for some of our 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.

¹ "LG Display Develops World's Most Energy Efficiency LCD TV Panel"
http://www.engadget.com/2011/10/10/lg-panel-puts-leds-along-a-single-edge-achieves-more-nits-with/#disqus_thread. Note: the 90W best in class value is for complete TVs, not just the panel, so it's not a direct comparison; however, given that the panel is the most significant contributor to overall TV power, the announced efficiency improvement is significant.

Figure 1: Comparison of example POP material from sponsoring utility programs (left) and EPA's 'Most Efficient 2011' program (right)



- 2) **We encourage EPA to streamline the 'Most Efficient' product registration process so that all models that meet the On Mode Power criteria are designated as 'Most Efficient'.**

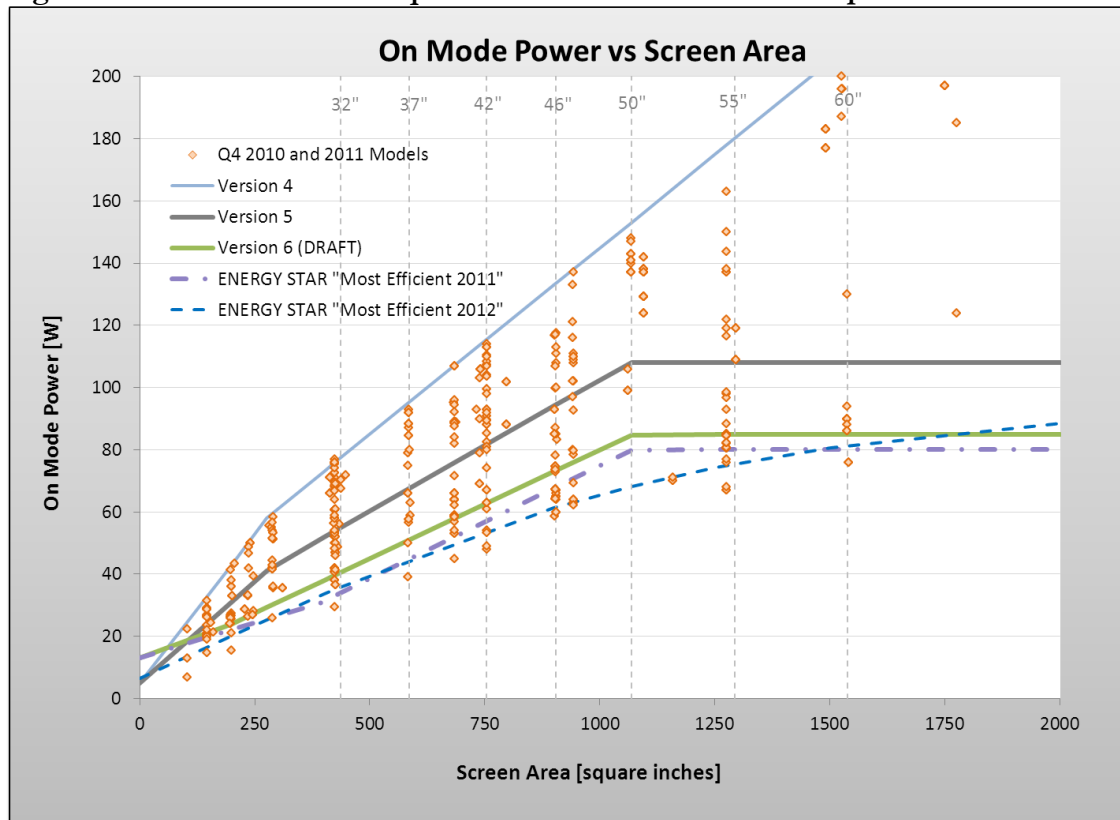
As EPA mentioned in its 'Most Efficient 2012' cover letter, nearly 180 models currently meet the 'Most Efficient 2011' requirements. However, there are less than 30 models designated as 'Most Efficient' on EPA's website.² EPA does not automatically qualify models for 'Most Efficient', and although the requirements for official recognition are minimal, it appears that only a limited number of manufacturers have taken this additional step. We suggest that EPA make its additional registration process requisite for being displayed on the ME web page, but not for qualification itself. To maximize the potential of utility co-branding and ensure that all products meeting 'Most Efficient' are recognized for their accomplishment, we recommend that EPA streamline the process by automatically qualifying all ENERGY STAR listed models that meet the ME On Mode Power criteria.

- 3) **We encourage EPA to maintain consistency in its approach to On Mode Power requirements for both ME 2012 and Version 6.**

The Most Efficient 2012 On Mode Power requirements are defined by a hyperbolic tangent function, which creates a curve that approaches an asymptote at roughly 95 Watts (see Figure 2 below). While we support EPA's new approach, it is a departure from the Version 5 and Draft Version 6 specifications, which consisted of a series of linear equations and a hard cap at 50 inches. We support EPA's new approach because it creates a simplified, smoothed curve across all screen sizes, and its asymptotic nature maintains the spirit of the 50" cap.

² http://www.energystar.gov/index.cfm?c=most_efficient.me_tvs

Figure 2: On Mode Power Requirements of ENERGY STAR specifications

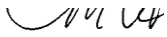


Currently, the Most Efficient 2012 curve intersects the Draft 1 Version 6 TV requirements at roughly 1750 in², creating a situation in which a large TV model could be qualified for 'Most Efficient' but not 'ENERGY STAR'. Therefore, we recommend EPA use a consistent approach between Most Efficient and the general ENERGY STAR TV specification and use a hyperbolic tangent function to develop On Mode power criteria in the next draft of its Version 6 specification. This will ensure that the Most Efficient initiative is a subset of the ENERGY STAR specification.

We appreciate your consideration for these comments and look forward to ongoing collaboration.

Sincerely,

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