



NRDC Comments on EPA's ENERGY Most Efficient 2012 Pilot Extension

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December 15, 2011

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's November 21, 2011 proposal to extend its pilot of the Most Efficient label through 2012. NRDC has been a longtime supporter of the ENERGY STAR program and strongly supports the addition of the Most Efficient designation. Most Efficient fills a much needed gap by allowing consumers to identify top performing products. NRDC supports the extension of the pilot for an additional year and urges EPA to make the Most Efficient designation a permanent part of the ENERGY STAR program. We also recommend that EPA consider adding additional product categories to the Most Efficient program as it develops. In particular, we recommend that EPA add a Most Efficient designation for screw based light bulbs, as discussed below. In general, NRDC supports the efficiency levels and additions proposed by EPA for the Most Efficient pilot extension. We offer the following specific comments on televisions, HVAC equipment, refrigerators, and light bulbs.

NRDC supports the strengthening of Most Efficient criteria for televisions.

NRDC strongly supports EPA's inclusion of TVs in their ENERGY STAR Most Efficient 2012 program and the stringency of the proposed specification. Despite establishing ambitious levels, the 2011 program has been a broad success as EPA reports there are already 18 qualifying models and these represent a wide range of sizes (16 to 60 inches screen size) and four different participating manufacturers. As the market has continued to shift towards even more efficient models, we support EPA's decision to increase the stringency of the Most Efficient specification to maintain the integrity of this leadership label.

The EPA has moved to a specification that is a smooth continuous curve where allowable on mode power increases as a function of screen size. NRDC endorses this concept as it requires super sized TVs to be more efficient in order to earn the ENERGY STAR Most Efficient label. The approach should also address industry's concern from earlier specs which had essentially a hard cap, whereby no additional power was allowed for TVs greater than 50 inches.

NRDC urges EPA to clarify that ductless mini- and multi-split AC and heat pump systems, as well as variable refrigerant flow systems, can qualify as Most Efficient. NRDC supports the inclusion of central air conditioners and heat pumps in the Most Efficient program and supports the specifications for these products. However, there are many products that meet the Most Efficient criteria, but which have not applied for the designation. Specifically, there are no mini- or multi-split systems currently designated as Most Efficient, despite the fact that there are products in this category that meet the specifications and are in fact more efficient than some of the currently designated Most Efficient air conditioners and heat pumps. It is our understanding that EPA intends for multi- and mini-split systems to qualify and is working to clarify misunderstandings over these products. We strongly believe that mini- and multi-split systems should be eligible for the Most Efficient designation as these products can achieve very high efficiencies and urge DOE to make it explicitly clear that they are eligible. For example, the Daikin Quaternity has a SEER of up to 26.1, an EER of up to 15.8, and an HSPF up to of 11,¹ but is not currently designated as ENERGY STAR Most Efficient. These efficiency specifications are much higher than many of the products currently designated as Most Efficient and therefore potentially misleading to consumers if not remedied. Additionally, variable refrigerant flow/volume systems should also be eligible for the Most Efficient designation. It is not clear from the current specifications that these products are eligible and this should be clarified in the specification description.

NRDC supports the addition of boilers to the Most Efficient pilot.

NRDC agrees with EPA's decision to add boilers to the Most Efficient HVAC suite and supports the proposed 95 AFUE specification. This specification would allow over 150 models to qualify, representing approximately 20 percent of current ENERGY STAR boilers, but is more stringent than the top CEE tier and the Section 25C tax credit levels. While in general EPA should attempt to align Most Efficient criteria with other high performance specifications, given the high percentage of ENERGY STAR models that meet the proposed Most Efficient criteria, we agree that the more stringent 95 AFUE specification is appropriate.

NRDC supports the Most Efficient specification for furnaces.

NRDC supports the 97 AFUE specification for non-weatherized gas furnaces. Similar to boilers, this would ideally be aligned with the 25C tax credit levels and top CEE tier,² however recent data shows that 95 AFUE furnaces represent 30 percent of the market,² which warrants more stringent criteria for the Most Efficient designation.

NRDC supports the Most Efficient specification for clothes washers.

NRDC supports the Most Efficient specification for clothes washers. In particular, we are pleased to see the tiered specification which allows smaller units to qualify, which was not the case in the original proposed specification.

¹ <http://www.daikinac.com/residential/productsUnits20-energy.asp?sec=products&page=55>

² <http://aceee.org/files/pdf/white-paper/Tax%20incentive%20white%20paper.pdf>

NRDC agrees with the increase of the maximum energy use allowable by refrigerators. In our April 6, 2011 comments on the Most Efficient proposed criteria, NRDC argued that ENERGY STAR should raise the maximum energy cap for refrigerators to qualify. At the previous cap of 403 kWh, none of the TopTen USA extra-large refrigerators could have qualified for the Most Efficient specification. NRDC supports the new proposed cap of 481 kWh, which just captures all of the Top Ten extra-large models. Similar to TVs, NRDC supports the concept that efficiency standards should be more stringent for large refrigerators. Whereas the current specification requires refrigerators to be 30 percent more efficient than the federal standards, refrigerators above a certain size would be held to a higher percentage improvement above the federal standard

NRDC 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. NRDC 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.

To establish a national “reach” target for manufacturers to design to and for utility programs seeking to achieve greater savings via their rebate programs, NRDC would like to see EPA add screw based light bulbs to its Most Efficient labeling program. This specification would build off the ENERGY STAR spec 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 spec technology neutral or whether to have separate specs for CFLs and LEDs, and whether to have specs for omnidirectional and/or directional bulbs.