



NRDC Comments on EPA's ENERGY STAR Most Efficient 2014 Proposed Criteria

September 5, 2013

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 proposed criteria for the Most Efficient 2014 label. NRDC has been a longtime supporter of the ENERGY STAR program and continues to strongly support the addition of the Most Efficient designation to the program. Most Efficient fills a much needed gap by allowing consumers to identify top performing products.

We offer the following general comments on the Most Efficient program and the proposed Most Efficient criteria for 2014.

General Comments on the Most Efficient Program

NRDC strongly supports the continuation of the Most Efficient program. The ENERGY STAR Most Efficient program fills an important role in identifying the best of the best products. The Most Efficient designation provides valuable information to early adopters of highly efficient products, who may be motivated by their environmental benefits. These early adopters play an important role in shifting markets towards greater efficiency and the Most Efficient label is an important tool to influence their purchasing decisions. It is particularly encouraging that 64 percent of households that have heard of the Most Efficient specification would buy a product based on the designation. We continue to strongly support the Most Efficient program and are encouraged by the progress it has made since the program's inception.

NRDC supports the annual updating of the Most Efficient criteria as appropriate. NRDC is pleased to see EPA's ongoing commitment to review the Most Efficient criteria annually. Having up to date specifications that continue to reflect the top of the market is important to develop and maintain the strength of the Most Efficient brand. EPA should continue to update the levels each year as appropriate to keep the specifications fresh. EPA should also consider whether to add new products to the Most Efficient program as appropriate. In comments on the 2013 Most Efficient criteria, NRDC suggested that screw-based bulbs, computers, and room air conditioners would all be potential candidates for addition to the program. While we understand that EPA did not consider the addition of new product categories for the 2014 criteria due to bandwidth, NRDC continues to recommend the consideration of these product categories for addition to the Most Efficient program in the future.

NRDC encourages EPA to update the information on Most Efficient on its website. EPA mentioned on the Most Efficient webinar that it was updating its website. EPA should consider making information on the Most Efficient specification more prominent on its website. For instance, EPA could include a description of the Most Efficient label under the “Buying Guidance” tab for an individual product. Additionally, information on Most Efficient qualified products is difficult to find via the website’s search function. For example, if you search “Most Efficient refrigerator” none of the links on the first page of results relate to the Most Efficient program. Continuing to improve the information provided to consumers through the Energy Star website will enhance the visibility and uptake of the Most Efficient designation.

Comments on Proposed Specifications

NRDC generally supports the proposed criteria for the 2014 Most Efficient specification with the following specific comments.

Televisions

NRDC supports EPA’s proposed levels for Most Efficient 2014 for televisions. The 2013 levels are in need of revision as 149 models already met the criteria as of June 2013 and since additional incremental energy savings can be achieved via an updated, more stringent level for 2014. Per EPA analysis, savings of up to 50% per TV can be achieved via purchases of Most Efficient 2014 models compared to a typical TV on the market today. These savings are compelling and the market appears ready to respond as today there are already 30 models on the market today that meet the proposed 2014 levels with the expectation that more models meeting these levels will enter the market in 2014. In addition, the models that already meet the proposed Most Efficient 2014 levels represent products from 9 different manufacturers and span the various screen sizes on the market.

NRDC also urges EPA to closely monitor manufacturers’ implementation of new features such as internet connected TVs to ensure they do not result in high levels of standby power that may not be accounted for in current test methods. Pending the findings of their investigation, EPA should address these new sources of energy use in their 2015 Most Efficient update and future revisions to the ENERGY STAR specification.

Monitors

NRDC supports EPA’s decision to maintain the Most Efficient criteria for monitors in 2014 at the levels set in 2013. We base this recommendation on EPA’s data that only 35 models on the market currently meet the requirements, which is only 2% of the monitor market.

Windows

NRDC supports maintaining the Most Efficient criteria for windows at the 2013 levels for 2014. We expect there would currently be a step function cost increase for any significant tightening of these criteria due to the current costs of high performance dynamic glazing (e.g., electro- or thermo-chromic). We note that the current criteria were largely made possible because of the DOE R-5 program. While the costs of achieving the

R-5 specification were thought to be high at first, manufacturers found fairly inexpensive ways to make a significant performance improvement largely by going from double to triple pane, using good insulating spacers, and filling with argon and krypton. We encourage EPA to work with DOE to develop the next generation of reach specifications for windows, which could be the basis for future Most Efficient designs.

Air Conditioners

NRDC supports the update of qualitative criteria for central air conditioners, heat pumps, and ductless air conditioners and heat pumps. The more specific proposed criteria will provide valuable information to technicians and product users.

NRDC also recommends that EPA update the quantitative specifications, in line with the comments we submitted on the 2013 proposed criteria. We recommend that EPA increase the Energy Efficiency Rating (EER) requirement to EER 13 or greater, which would align with the highest CEE tier, as last updated in 2009. EER is important for reducing peak load and therefore valuable for utility programs. Furthermore, many of the products currently qualified at Most Efficient have EERs that exceed 13, some by substantial amounts.

Finally, we continue to recommend that EPA consolidate the specification for ducted and ductless systems. These products do not offer an inherently different utility to consumers and should not be held to different standards.

Thank you for the opportunity to submit these comments.

Sincerely,



Meg Waltner
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