

September 6, 2013

Ms. Verena Radulovic
Product Manager
ENERGY STAR Program
U.S. Environmental Protection Agency
Via e-mail: mostefficient@energystar.gov

Re: Panasonic Comments on ENERGY STAR Most Efficient 2014:

Panasonic appreciates the opportunity to comment on the ENERGY STAR Most Efficient 2104. As a leading manufacturer and marketer of all television technologies, Panasonic is a strong supporter of the ENERGY STAR brand and its program objectives, which have been exemplified in current lineup of our most efficient TV models ever.

ENERGY STAR Most Efficient 2014 Qualifying Criteria:

In its July 26, 2013 letter to ENERGY STAR Partners and Stakeholders, EPA discussed the proposed criteria for the television product category as follows:

Televisions

When the ENERGY STAR Most Efficient 2013 Television criteria were finalized, approximately 35 models could meet these criteria, representing about 5% of the market. At this time, that model count has grown to 151 models, representing approximately 11% of the market. As of July 2013, the proposed criteria for 2014 would recognize 30 models across various sizes.

We understand and applaud that televisions are continuing to improve their energy efficiency at a rapid pace, and recognize that the new criteria should further differentiate what is considered to be “Most Efficient” in 2014. However, as in 2013, we feel that a target Most Efficient qualification of 5% of the market is appropriate. At the time of the July 26th EPA letter, 151 models represented 11% of the market. Therefore 5% of the market would correspond to 69 models, not 30.

Panasonic recommends that the Most Efficient 2014 criteria be designed to qualify 69 models across various sizes as opposed to only 30.

Panasonic has been a longtime proponent of the ENERGY STAR program and believes its partnership with EPA has provided a valuable tool by which consumers can make better informed choices about their purchases of energy efficient products.

As always, Panasonic appreciates the opportunity to comment on the ENERGY STAR Most Efficient 2014 and welcomes the opportunity to further discuss our views with you.

Sincerely,

Mark J. Sharp
Group Manager
Panasonic Corporation of North America