

2010 04 27

Kathleen Vokes
Energy Star Verification Program
United States Environmental Protection Agency

Subject: Enhanced Energy Star Testing and Verification Requirements

Hello Kathleen,

Manitoba Hydro is pleased to see Energy Star's proposals for the enhanced Energy Star Testing and Verification requirements. We are the natural gas and electric utility in Manitoba, Canada and promote the Energy Star label in many of our programs. We appreciate the opportunity to provide recommendations to assist in improving the process.

Manitoba Hydro staff had issues with one Energy Star approved heating boiler which received performance ratings higher than theoretically possible. The boiler was tested by an accredited laboratory. We initially went to Energy Star Canada to express our technical concerns and we found that they had no formal process to deal with the issue. Energy Star Canada did not appear to have a technical person to review the information and relied on the final results from the efficiency test for verification. This illustrated to us that substantial changes were needed in Energy Star's certification and challenge process.

Based on our past experience we request that the new testing, verification and enforcement processes include the following recommendations:

- Manufacturers provide complete test report data to Energy Star.
- Availability of all testing and verification documents to stakeholders upon request.
- Conduct a technical review of all product test report submissions.
- A technical liaison for manufacturers and stakeholders to address technical issues of the ratings of specific products.
- Development of a formal and transparent challenge process for stakeholders who may question the validity of certified products.
- Unless otherwise agreed upon, ensure that sources of formal challenges are kept confidential.
- Development of a clear and consistent process for manufacturers to follow to receive energy star labeling.

Many stakeholders such as Manitoba Hydro have technical staff that can be utilized to assist Energy Star's quality assurance process.

If you have any questions please give me a call at (204) 360-7716.

Regards,

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