



Natural Resources
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January 8, 2010

First of all we would like to thank you for the opportunity to comment on the December 2, 2009 document *Enhanced Program Plan for ENERGY STAR Products*. As the most active of ENERGY STAR's international partners and the custodian of an extremely active and aligned minimum energy performance standards regime and associated infrastructure, Canada is inevitably affected by changes to such a core program in its efforts to reduce greenhouse gas emissions.

The timing for the enhancement process is most propitious. We are well aware of some of the drivers of this process and indeed many of them are evident in Canada as well. Additionally, we are soon to enter the fourth and final year of our current eco Energy mandate and are actively contemplating what worked and what didn't, what needs to be enhanced and what needs to be developed for our next program. Finally, there may well be some timely ongoing implementation opportunities as we have commitments to develop and renew under the Clean Energy Dialogue and the Letters of Agreement process. We have provided our comments on the elements of your proposal as you have presented them and we look forward to a continued dialogue in the ensuing weeks and months.

1. *The ENERGY STAR Program will be expanded to cover more products at a faster pace.*
2. *Revisions to existing ENERGY STAR specifications will be undertaken more frequently so that the ENERGY STAR label continues to highlight top energy efficient products.*

NRCan is supportive of the approach to add more products and to timely revision of the specifications for existing products within the ENERGY STAR family. In addition to the product categories mentioned in the document NRCan has specific interest in commercial space conditioning products (heating and cooling).

Opportunities to collaborate

NRCan has taken on an active role in the development of ENERGY STAR criteria for decorative light strings and Heat / Energy Recovery Ventilators. We look forward to discussions to identify longer term priority areas and opportunities where NRCan might take an active role in the development of future criteria. We have had some preliminary discussions and look forward to continuing these.

3. *A comprehensive program for product testing and verification of products earning the ENERGY STAR label will be developed and implemented.*

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Canada has an extensive third party certification program in place for all regulated products since 1995. This requires regulated products to carry the verification mark from a Standards Council of Canada accredited certification body that indicates that it meets the minimum energy performance requirements as determined by a verification program. In Canada this verification extends to regulated ENERGY STAR products such that the performance for compliance with ENERGY STAR levels is also verified. We believe that it would be in the best interest of our integrated market that, consistent with the levels of due diligence appropriate for regulatory and voluntary programs, the monitoring and verification programs be as closely aligned as possible.

Opportunities to collaborate

Fifteen years of experience with verification programs has taught us that they can be complex and difficult to communicate. Given the market realities it would serve us well to ensure that mutual recognition as appropriate of programs or parts of programs were to be the norm. The enhanced program also proposes ongoing off-the shelf product testing. NRCan also does similar testing as part of monitoring compliance with the regulations as well as ENERGY STAR. Since many products sold in Canada are sold in the US there should be an opportunity to coordinate efforts and share results. NRCan would be more than willing to participate in any program development forum that ENERGY STAR might like to suggest.

4. Enhanced testing procedure review, improvement, and development will occur.

NRCan agrees that test procedures are core to energy efficiency programs, from minimum standards to comparative labelling to endorsement labels. Having a consistent process for establishing test procedures is important to these programs. However, the document is not explicit on the role of DOE in the case where there is test procedure available from an external standards development organisation. Will there be a process by which external test procedures will be evaluated to determine its appropriateness for application in North America?

Opportunities to collaborate

NRCan and other North American stakeholders support standards development through the Canadian Standards Association. There are many test procedures available or in development through this process that might offer significant opportunities to reduce cost and facilitate alignment.

5. Quality installation programs in key product areas will be developed.



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NRCan is in total agreement that quality installation is a significant component for achieving product performance expectations and we concur in your assessment that cooling and heating are priority areas. An area of equal concern in Canada is that of window performance.

Opportunities to collaborate

NRCan is currently developing a windows installers' certification program. While we recognize that US and Canadian construction practice in this area may differ somewhat, insofar as the certification program is a process oriented approach there may well be some synergies that would be attractive from a joint approach.

6. Research related to a potential ENERGY STAR top-tier program will be conducted.

We are extremely supportive of the proposals regarding understanding the possibilities of a top tier program. We all have ambitious targets and experience has shown that if the right signals are given the response can surprisingly swift. Nonetheless, both EPA/DOE and NRCan have invested a lot in ENERGY STAR in its current edition and recognize the importance of having a solid basis upon which to extend it farther and faster.

Opportunities to Collaborate

You may be aware of early use of the Save More television program by BC Hydro and as the need to pilot other offerings arise it is likely that there will be willing participation in many areas of Canada. NRCan looks forward to being a collaborator on these projects.

In conclusion, as we move forward on our respective paths to a more energy efficient North America and all the benefits that that entails we look forward to a continuing close relationship with ENERGY STAR. Thank you for the opportunity to comment.

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Cc; Carol Buckley, Director General, Office of Energy Efficiency