

Comments on the Enhanced Program Plan for ENERGY STAR Products & Lighting Integration Proposal

Submitted by Wisconsin Energy Conservation Corp

Wisconsin Energy Conservation Corporation (WECC) appreciates the opportunity to provide the Department of Energy (DOE) and the Environmental Protection Agency (EPA) with comments on the ENERGY STAR® Qualified Lighting Integration Proposal and the Enhanced Plan for ENERGY STAR Qualified Products. .

Introduction

WECC, founded in 1980, is a nonprofit organization specializing in the design, implementation, and administration of energy efficiency programs. WECC is a national leader in energy efficiency programs by demonstrating profitability and value of market channel integration. WECC is the program administrator for Focus on Energy, Wisconsin's statewide energy efficiency and renewable energy program. Focus on Energy was created by the Wisconsin Legislature in 1999 and further expanded in 2005. The goal of Focus on Energy is to increase Wisconsin's energy independence by helping residents and businesses implement efficiency and renewable energy projects that otherwise would not occur. Focus on Energy offers several award winning residential programs including Wisconsin ENERGY STAR Homes, Home Performance with ENERGY STAR and the ENERGY STAR Appliance and Lighting Program and has been the recipient of an ENERGY STAR award each year for the last 9 years. In addition to the Focus on Energy program, WECC administers and implements energy efficiency programs for clients throughout the Midwest and was a founding member of the Program for the Evaluation and Analysis of Residential Lighting (PEARL).

Enhanced Program Plan for ENERGY STAR Products

WECC is very pleased to see the new MOU between the DOE and the EPA, through our experience actively developing and running ENERGY STAR programs for the last decade we have experienced first hand the frustrations that the prior relationship between EPA and DOE created for programs. We see this MOU as a necessary and exciting step forward and agree that it will "accelerate the adoption and use of energy efficient technologies in the built environment".

While the documents currently open for comment are specifically related to ENERGY STAR Products and the Lighting Integration Proposal WECC would like to take a moment to also comment on the Enhanced Stakeholder Outreach and the National Building Rating Program.

In regards to the Enhanced Stakeholder Outreach WECC is supportive of holding stakeholder meetings twice annually and of the more open stakeholder comment processes for the development of ENERGY STAR qualified products

WECC agrees that the National Building Rating Program provides strong opportunity to "help building owners understand the efficiency of homes and buildings and the set of cost-effective steps they can take to improve that efficiency, and for accountability in measuring the energy savings". That said WECC urges the agencies to ensure they work on this in close coordination with the many mature and existing programs that are running around the country and that this effort aligns with the already mature Home Performance with ENERGY STAR program. WECC

agrees that there is a significant need for a way to not only compare the energy use of existing buildings with similar buildings but that there be an easy to understand labeling program (ENERGY STAR being a viable label option). We also must note that WECC is already making investments in the development of tools and technologies designed to meet some of the goals outlined by DOE. Current needs and goals require this happen now and can not wait, we strongly encourage DOE to engage advanced programs in the dialog early and allow for some flexibility within the program so that already running programs can be modified to incorporate any DOE requirements. In addition WECC firmly believes that a performance model would be the most appropriate approach because it leads to more comprehensive retrofits. Prescriptive approaches do more to affect the low hanging fruit, often only affecting equipment that would have been replaced anyway. These single measure actions create small savings and leave large lost opportunities. There is consensus in the industry that comprehensive building retrofit is critical. A prescriptive approach minimizes the importance of whole building retrofit, does not create new employment opportunities (after all you are paying for the replacement of something that would have been replaced anyway, not paying for the improvement of the whole building, something unlikely to have been done without program support) and sends the wrong message regarding the importance of addressing the house as a whole.

New ENERGY STAR Products

WECC agrees that it would be beneficial for the program to cover more energy using consumer products. While focusing on product categories in widespread use and with significant energy consumption is critical, that must be balanced with setting individual customer expectations about what they might be able to save. This is especially important in the “Miscellaneous products and the networked home” category. We would suggest that a draft version of this list be shared with stakeholders each year prior to it being finalized in the annual planning process

Frequent Updates to ENERGY STAR Criteria

WECC is in agreement with the plan to ensure that revisions to ENERGY STAR specifications be undertaken more frequently. From our experience the sometime slow moving process for updating a product labeling criteria has lead to mistrust and lack of confidence in the program and the ENERGY STAR label. While we agree that product shipment data will be important for determining which specifications warrant updating we also believe that this needs to be viewed in the context of total sales and market share for ENERGY STAR qualified products. Knowing how many qualified units are shipped only tells program sponsors a portion of the story they need to ensure cost effective use of rate payer funds. More critical for programs is understanding what percent of the total market share is owned by ENERGY STAR qualified products. While we realize that the program has attempted to collect this data in the past we also know it has been sporadically reported, it may be worth using this opportunity to reinforce the importance of this with manufacturers and retailers. WECC also request this data be collected at the state level and aggregated into a format that may be shared with stakeholders.

Enhanced testing procedure review, improvement, and development

Credible, real world test procedures are critical for maintaining the integrity of the ENERGY STAR brand. This continues to be an area that drags the label down, updating testing procedures should be a top priority.

Quality Installation Programs

WECC believes it is important, based on the technology, to address quality installation and maintenance if energy savings will result. We however ask the agencies ensure that they look

at this based on climate. This is not a place where a one size fits all approach will work. In the case of Quality HVAC Installation, there is extensive evidence through research funded by Focus on Energy, that states like Wisconsin with a low cooling load, see little or no savings from enhanced air conditioner installation practices. Were a state like Wisconsin with only 310 cooling hours a year forced to include Quality HVAC Installation practices in ENERGY STAR cooling efforts, we would be hard pressed to use of the label as a platform in the program. In short, it is important to look at Installation programs in light of the regional climate and ensure that these standards are adapted to reflect the cost effectiveness of requiring installation practices that may offer large benefit on one climate and little or no benefit for another. WECC does support the consideration of health and safety issues when looking at installation guidelines.

Top-tier program (Super Star)

WECC supports the exploration of a "super star" program that within ENERGY STAR. WECC, for the last few years has offered many programs that limit incentives to only to most efficient in an ENERGY STAR category (often following CEE Tier III specifications). While some have worried levels within ENERGY STAR could muddy the waters for consumers our experience is that they are able to easily understand this. By having a specific sub brand to identify these products we make it even easier for consumers to make an informed decision. WECC is excited to support the exploration of this concept.

Comments on the Lighting Integration Proposal

WECC is pleased to see the effort that has been made in developing the proposed integration plan for ENERGY STAR qualified lighting. This is a clear indication that the agencies have a strong commitment to energy efficiency. In general WECC supports the Integration Proposal and will continue to participate as a stakeholder ensuring that specifications meet the high standards we expect from the program.

WECC believes that remaining technology neutral and considering the fixture type (as defined by industry accepted sources) when establishing specifications and testing requirements is an appropriate approach.

We support both the plan to integrate the current ENERGY STAR Compact Fluorescent Lamp specification and the Integral LED Lamp specification and the timing of (late 2010) for this. WECC on behalf of Focus on Energy will support his effort through our work on the CEE Residential Lighting Committee, which has been working over the past year to identify potential enhancements to the ENERGY STAR CFL specification.

WECC is reserving comment on the commercial and industrial lighting proposal until there is more clarity on this piece of the plan. We are interested in the development of specifications for products in the C&I category in the future but would encourage thorough investigation, and involvement of program partners in this process.

As a founding member of the Program for the Evaluation and Analysis of Residential Lighting (PEARL) we support the idea that verification testing programs that are already in place continue to allow time for a more robust testing program. As a partner in the PEARL program WECC was provided with valuable details on products that went through testing and ask that stakeholders continue to receive the same type of detailed information on product performance

and timely information on decisions that might be made by EPA regarding the product's ENERGY STAR qualification.