

via email: vargas.maria@epa.gov

October 28, 2010

Ms. Maria Vargas
ENERGY STAR Program
U. S. Environmental Protection Agency
Washington, DC 20460

Dear Ms. Vargas:

Re: Proposal for Comment: Advancing the Market for Top Tier ENERGY STAR Qualified Products

I am an energy and environmental consultant. I have a number of clients that I help to become more energy efficient and environmentally sustainable mostly through purchasing choices, focusing on lighting products. I do ENERGY STAR commercial building lighting audits. While lighting is not one of the categories for this top tier efficiency effort, I would like to comment on the overall approach to your Top Tier program since it is likely to be expanded to include other commodities such as ENERGY STAR lighting products.

Need for the Program

The program is needed and provides a valuable structure to help guide consumer confidence as well as help manufacturers compete with each other on a level playing field without triggering antitrust or confidential business issues. The ENERGY STAR program has been very effective since its inception. However, with so many products now labeled "ENERGY STAR," the program has become the norm rather than the exception to helping consumers choose the most efficient products.

A Top Tier program will help drive technology but will probably serve best to help educate consumers on efficiency more than anything else. This will be very valuable. Consumer choices are often made on the initial upfront cost of any product and its aesthetics rather than its efficiency or life cycle cost.

Performance Level Eligible for Recognition

Of the performance level options you listed as recognizing superior performance, Option 3 "Establish a performance level equal to the top 5% of the efficiency range demonstrated by the ENERGY STAR qualifying products" appears to be the best to help drive technology. This narrower approach keeps the program focused on objectives, rather than model types or existing technologies. Keep this program challenging to drive technology. This option also would be the most transparent and the easiest for the government to implement. It puts the burden on the product manufacturer to prove their products' efficiencies. The government should not appear to be sanctioning one product over another. Any labeling should be focused on the products'

attributes, rather than on the products themselves. If a product is deemed to be “most efficient”, it should be clear how that is defined. For example, I would like to see light bulbs measured and labeled in terms of lumens per watt so a consumer can see what output they are getting for each input.

Comments on Metrics/Integration with other programs

While this Top Tier program seems initially aimed at household consumer purchases, other programs such as the U. S. Green Building Council’s Leadership in Energy and Environmental Design are developing metrics to measure footprints of structures including homes. There needs to be better cross-integration between ENERGY STAR and “green” programs such as this to minimize confusion and keep purchasing choices consistent. To create additional purchasing incentives, perhaps U. S. Green Building Council LEED certification projects can gain extra credit points for their ratings if the products they purchase are rated “Top Tier.”

Sincerely,

Joan W. LaRock