



April 6, 2011

Ms. Vargas
United States Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Ave NW
Washington, DC 20460

Subject: Follow up Comments to the ENERGY STAR Top Tier Proposal

Dear Ms. Vargas,

On behalf of Northwest Energy Efficiency Alliance (NEEA), Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Sacramento Municipal Utility District (SMUD), we respectfully submit comments in regards to the ENERGY STAR Top Tier Proposal issued March 17th, 2011. While the Top Tier Proposal includes six separate product categories, our comments focus specifically on the Top Tier for televisions.

The Business and Consumer Electronics (BCE) program managers support and commend EPA's efforts to establish a Top Tier class for the most efficient TVs on the market. However, we strongly recommend that Top Tier more align with existing utility incentive programs to maximize the program's effectiveness and maintain a consistent message to its target audience.

As sponsoring members of utility incentive programs for TVs, we work with retailers and manufacturers to help consumers become more informed about the benefits of purchasing energy-efficient TVs. The Program provides financial incentives and marketing support to encourage manufacturers and retailers to educate, promote and sell the most energy-efficient TVs on the market. We currently promote products which meet and exceed existing and future ENERGY STAR specification levels. Thus, we have a strong interest in supporting and aligning our program with ENERGY STAR's Top Tier which successfully distinguishes the most energy efficient TVs on the market.

1) We urge EPA to align Top Tier with the Consumer Electronics industry timeline for selecting and delivering new TV models, embraced by existing market programs.

The midstream BCE program establishes annual specification levels that reward manufacturers and retailers in developing, promoting, and selling best in class high-efficiency products. The program managers aim to have the coming year's specification for qualifying products finalized and begin delivering that specification to retailers early September of the current year. This allows for timely communications so the programs incentives can be considered by retailers during the critical stocking discussions that take place each fall. Those new TV models are typically introduced during the months of April and May. Therefore, to enhance its' effectiveness the BCE Program has shifted to embrace the industry cycle. Since the TV model life is typically April to March, we request the EPA eliminate the year designation on the signage, as it will reduce the program's impact for up to 25% of the lifecycle. To be most effective, we ask that the EPA consider the TV lifecycle when determining the timeline for when new products and specifications are announced. In order to effectively integrate Top Tier into existing utility programs, upcoming specification details need to be received no later than May end of the current year.



2) For the 2011 Top Tier program we recommend the EPA align with existing utility program specifications for qualifying TVs.

BCE Program managers support EPA's efforts to establish a Top Tier performance level which includes a limited set of qualifying models, representing the latest technological advancements, while maintaining sufficient product availability to support administered energy efficiency programs and retailer efforts.

The BCE program managers would recommend EPA align Top Tier qualifying terminology with existing voluntary programs that seek to deliver a retailer-compatible specification by simplifying the manner in which TVs qualify for Top Tier. A preferred specification level aligned with existing programs such as ENERGY STAR version 5 + 2x% (indicates a percentage more stringent than the version 5 spec) would be consistent with how the BCE communicates qualifying specification levels to participating retailers.

The BCE Program is very concerned with consumer confusion and believes a third qualifying tier with additional signage will contribute to further confuse customers trying to make a purchase decision. Participating retailers have already expressed their concerns with regards to this matter. Aligning with the BCE Program's earlier proposed qualifying level of ENERGY STAR 5+20% remains the preferred Top Tier specification level for 2011.

3) Supporting Top Tier with Utility programs

The BCE partners are strong supporters of the EPA's Top Tier program and seek opportunities to incorporate the program's specifications into future BCE programs. We would appreciate an open dialogue when specifications and time-lines are created, to align our incentive dollars with the EPA's Top Tier program.

We appreciate your consideration and look forward to ongoing collaboration.

Sincerely,

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