



October 29th, 2010

Ms. Maria 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 Maria Vargas,

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

We support EPA's efforts to establish a Top Tier class for efficient TVs on the market. In addition, we strongly recommend that the initial Top Tier level 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 that meet and exceed ENERGY STAR specification levels. Thus, we have a strong interest in supporting and aligning our program with an ENERGY STAR Top Tier proposal which successfully distinguishes the most energy efficient TVs on the market.

1) We urge EPA to align its Top Tier messaging and performance levels with existing utility programs so that the process is streamlined and clear for stakeholders.

Aligning Top Tier performance levels with current utility program efforts will help to maintain clear and consistent message to consumers—an essential element for a successful roll-out. Our utility-sponsored electronics programs include specially designed point of purchase materials (see below), which indicate whether a TV meets certain required performance levels. These materials and their corresponding performance levels have been carefully designed to maintain a consistent and accurate message of product efficiency.

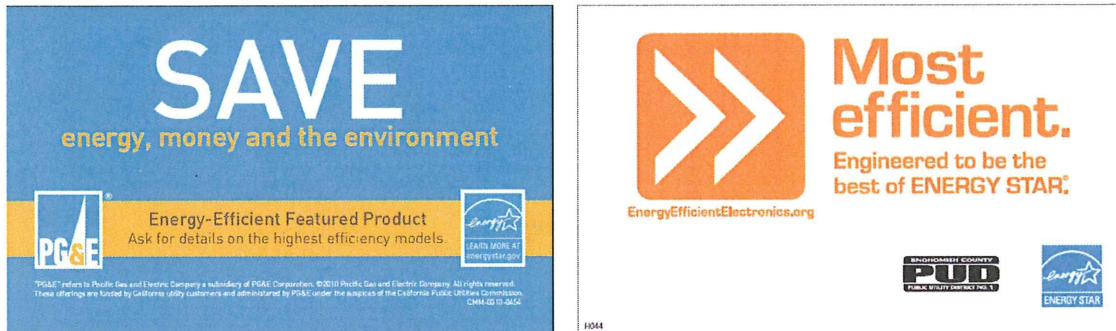


Figure 1: Example POP material from sponsoring utility programs

Our projected incentive levels for 2011 TVs are two levels: 1) Energy Star 5.1 TVs; and 2) TVs that are at least 20% more efficient than Energy Star 5.1, or “ES 5.1+20%”. We have already informed our retail partners of these levels, and stocking and marketing efforts will be developed accordingly. Given the limited timeline for the initial rollout of the Top Tier program, we urge EPA to align its Top Tier messaging and performance levels with existing utility programs so that the process is streamlined and clear for all stakeholders.

2) We recommend the Top Tier performance level for televisions be set at ENERGY STAR 5.1+20%

We support EPA’s efforts establish a Top Tier performance level that includes a very limited set of qualifying models, representing the latest technological advancements, while maintaining sufficient product availability to support administered energy efficiency programs and retailer efforts.

We support EPA’s decision to evaluate product performance levels on a case-by-case basis since the variables for each product can be quite different. Based on the conditions specific to the TV market, we recommend the EPA establish a performance level of ES 5.1+20%. We believe that the ES 5.1+20% performance level is commensurate with the EPA’s stated goals for Top Tier requirements because it provides consumers with a choice of brands and screen sizes while highlighting the next generation of efficient technologies.

As the graph below indicates, a very limited number of TV models meet the requirements for ES 5.1+20%. Based on data from the most recent ENERGY STAR Television Product List (October 15, 2010), only 7% (53 of 724 models) of listed products meet ES 5.1+20%. Based on initial utility Program sales data for Q3 2010, we estimate these models account for roughly 2% of ES 4.1 sales and less than 1.5% of total unit volume in the TV market.

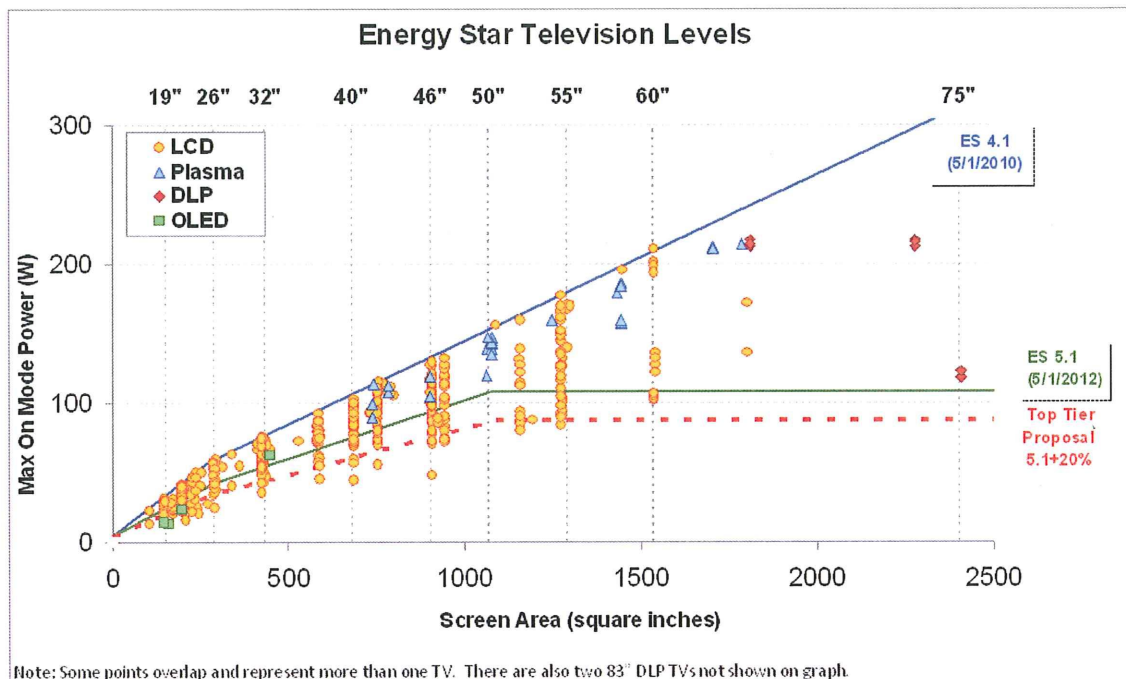


Figure 2: Energy Star listed television levels meeting various Energy Star performance requirements. TVs that meet the proposed Energy Star 5.1+20% are located under the red dashed line

Models which meet ES 5.1+20% represent the most cutting edge of TV technology today, and incorporate the most recent technology advances such as LED backlighting and OLEDs. These models are 42-64% more efficient than the current 4.1 specification and represent the highest levels of efficiency available on the market today. These models are distributed across twelve different brands and are available in fourteen distinct screen sizes ranging from 16"-55" (see below). The ES 5.1+20% performance level provides broad range of product availability in screen sizes and brands.

We appreciate your consideration for these comments and look forward to ongoing collaboration.

Sincerely,

Claire Fulenwider

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