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Sent: 10/28/2010 06:08 PM MST

To: Maria Vargas

Cc: "Claire Fulenwider" <CFulenwider@neea.org>; "Scot Davidson" <SDavidson@neea.org>

Subject: ENERGY STAR Top Tier Proposal Feedback

Hi Maria,

Thank you for this opportunity to comment on the ENERGY STAR Top Tier proposal. I appreciate the challenges you face launching a Top Tier strategy for the ENERGY STAR brand, and we are grateful of your leadership in growing and strengthening the demand of energy-efficient products and services throughout the country. In addition, I have valued working with you on the Northwest consumer electronics top tier research, and welcomed your insight, wisdom, and time advising us during the research process.

NEEA is supportive of your work in defining a Top Tier for ENERGY STAR. We do have some questions about how Top Tier will be executed, particularly under a tight timeline. We offer the following recommendations to ensure Top Tier success, and look forward to discussing our feedback with you.

- ENERGY STAR will determine the Top Tier on a case-by-case basis and plans to roll out the program in 2 months.

Concerns:

- A top tier level of ENERGY STAR should be predictable and transparent. How is Top Tier determined? How are stakeholders involved? Is there time for a stakeholder process? If not, who are the influencers? How would this be explained to consumers, retailers and manufacturers?
- How are regional differences of energy efficiency market adoption evaluated? The Northwest would not want dilution of our existing consumer electronics initiative and any other programs Northwest utilities may have that are more aggressive than the rest of the country. As an example, in televisions, California and the Northwest will incent retailers in 2011 for the sale of ENERGY STAR 5.1 and 5.1 +20%. Other stakeholders/utilities may not be as supportive of this stringent of a tier in their territories because significant inventory of these products are not at retail today. If our efforts are complimentary to an ENERGY STAR Top Tier initiative, we can continue to be successful in driving further levels of efficiency in televisions and supporting Katherine Kaplan's specification work.

Recommendation:

- Instead of case-by-case, we'd prefer to see the top 5% of products be designated as a Top Tier. It's easy to explain, predictable for manufacturers (sets a road map), and enough provides enough volume to move markets and gain energy savings.
- ENERGY STAR will not have a new label, but will have messaging for the Top Tier. The Top Tier is proposed for six product areas initially. Only qualifying products in these six product categories will be allowed to use the Top Tier messaging.

Concern:

- We are using “top tier” messaging for super-efficient TVs, computers and monitors right now (Most Efficient messaging). Under the current proposal, we would only be allowed to have messaging on TVs and not on the computer monitors and desktops or any other higher tier consumer electronic products we are promoting. Would energy efficiency programs promoting higher levels of efficiency outside the six products have to have two sets of messaging? There is potential for customer confusion as well as significant complication to our existing programs.

Recommendation:

- We would prefer a broader range of product categories with the Top Tier designation, perhaps informed by super-efficient programs already in existence in the country, such as the California and Northwest consumer electronics initiative.

Additional comments:

- We would like ENERGY STAR to support and coordinate with other market-based and government programs underway in the market, i.e., SEAD Initiative, CEE, EPEAT, and TopTen.
- We want to ensure the ENERGY STAR core program has ample resources to maintain and deliver on its promise. Does ENERGY STAR have the resources for a successful and nimble Top Tier initiative without diverting funds from the core ENERGY STAR program? Significant resources have recently been directed to ensure ENERGY STAR maintains a target of top 25% of products and improves the testing procedures of qualifying products. We applaud the focus the core ENERGY STAR program is now receiving. A new Top Tier program will be expensive. As much as we support Top Tier, we do not want it to come at the expense of the core ENERGY STAR program.

Again, NEEA supports an ENERGY STAR Top Tier program. We provide these comments to ensure a successful program and smooth launch. We believe an ENERGY STAR Top Tier program, coordinated with both the most progressive utility energy efficiency programs and other market-based energy efficiency initiatives can elevate and accelerate energy efficiency standards across the country.

Thank you, Maria, for the opportunity to provide comment for consideration.

Regards,

Stephanie

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