

April 15, 2010

Robert Meyers
ENERGY STAR[®] Program
U.S. Environmental Protection Agency
Washington, DC 20036

Dear Robert,

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments on the Product Specification Discussion Document for ENERGY STAR Computers dated February 2011. We appreciate EPA's solicitation of input at this early stage in the specification development process, and look forward to providing detailed comments on forthcoming specification proposals.

The Consortium for Energy Efficiency (CEE) is a twenty-year-old nonprofit organization where efficiency program administrators from 43 states and eight provinces come together to make programs more effective and address broader topics, such as ENERGY STAR. CEE members direct over 80% of the \$7.5 billion energy efficiency industry and play a major role in achieving our national climate goals. In 2009, the year EPA recognized CEE with the Climate Protection award, our industry abated 80 million metric tons of carbon—the equivalent of 20 coal fired power plants.

CEE members depend on ENERGY STAR as a foundational element in local programs and need a strong, meaningful ENERGY STAR brand to drive the necessary increases in efficiency through mass markets to achieve significant efficiency goals. CEE members actively work to make ENERGY STAR the relevant platform for energy efficiency, and highly value the role ENERGY STAR plays in differentiating energy efficient products and services that CEE members support locally. We would like to thank EPA for the opportunity to provide comments on this specification revision. The comments CEE submits today were informed by input from the CEE Consumer Electronics Committee (Committee).

Difference in Residential and Commercial Market Penetration

One CEE member has conducted research in its service territory in California that indicates the market penetration for ENERGY STAR desktop computers is significantly lower for the residential market than among commercial purchases (roughly 17% and 50% of sales volume, respectively). We are interested to know if EPA has a similar understanding of national market penetration for

ENERGY STAR computers. If so, it would be helpful for EPA to explain how they have referenced or balanced these markets in their effort to adequately differentiate efficient products.

CEE Supports a Scope for ENERGY STAR That Includes Many Types of Computers

CEE understands that EPA is refining its definitions of types of computers (e.g., desktops, laptops, and tablets), and is considering new approaches to the qualification requirements for amenities that could be added to a basic model (e.g., discrete graphics cards). CEE offers several suggestions below for how EPA could approach these issues in a way that could make the ENERGY STAR program more useful for efficiency programs. CEE supports EPA's work to maintain the relevance of the ENERGY STAR label as an effective differentiator of efficient computers of all types and configurations provided the tenets of ENERGY STAR are attainable.

- Pursuing Energy Savings in Laptops

CEE supports EPA's intent to realize energy savings opportunities that laptops represent, but CEE members are challenged to use the same program approaches that have proven cost effective for desktops since the average laptop uses less energy than the average desktop. When proposing qualification requirements for Version 6, we recommend that EPA share existing data on energy consumption of laptops and desktops, as well as describe how the proposed requirements will address the unique differences in laptop computers.

- Appropriate Treatment of Discrete Graphics Cards and other Components

CEE supports EPA's careful consideration of how to treat discrete graphics cards, given data presented at EPA's March 10th stakeholder meeting that indicates that their power consumption could represent a significant portion of a computer's electricity use. Also, CEE recognizes that the specification must balance several factors, including the relationship of actual graphics performance to any additional wattage allowances for additional amenity. Therefore, when EPA releases future proposals or information, it would be helpful to provide further details on how the program will address discrete graphics cards, and the associated tradeoffs of the proposed strategy. CEE also recognizes that other optional computer components consumers may select when purchasing a computer could significantly impact power consumption, and looks to EPA to characterize any associated potential for energy savings. This will enable CEE to evaluate their impact on efficiency programs and provide actionable comments to EPA.

- Interest in Tablets

CEE understands that EPA is considering inclusion of tablet computers as a distinct product category in the Version 6 computers specification. CEE does not have specific information to inform EPA's consideration of these products. CEE would be eager to receive any information from EPA about these products' sales volume, usage, and energy use, as well as how the energy consumption of tablets compares to products that provide similar functionality and amenity (e.g., eReaders and perhaps smartphones). These data would help CEE members thoroughly evaluate the feasibility of programs that would promote ENERGY STAR tablets through incentives or other mechanisms. Efficiency programs have discussed at CEE the potential for programs that promote tablets given their gain in market share, but have not seen data or analyses that reveal sufficient potential energy savings in tablets to support a cost-effective program. We appreciate EPA's leadership in assessing this market opportunity, and sharing the findings with stakeholders.

Cost-Effective Energy Savings Remain a Primary Consideration for Creation of Local Incentive Programs.

CEE supports EPA's efforts to identify all technical and functional attributes of a computer that could be improved to reduce energy consumption. Local program administrators would welcome any new information EPA is able to provide about the energy savings potential of these products and the incremental cost of achieving those savings. The additional cost of purchasing an ENERGY STAR computer, versus a standard efficiency computer, will affect efficiency programs' ability to promote ENERGY STAR products with incentives or to invest in significant marketing campaigns for ENERGY STAR computers. CEE would value any information or analysis that EPA could provide regarding the retail price difference between a standard efficiency computer and one that meets the proposed ENERGY STAR requirements as well as the associated per-unit energy savings of a qualifying computer. In turn, CEE will share the considerations, assumptions, and data inputs that affect cost-effectiveness tests currently used by local computer efficiency programs.

Thank you again for the opportunity to comment. CEE strongly supports ENERGY STAR and we are eager to work with you to consider how best to position ENERGY STAR in the computers market. If you have any questions about these comments, please contact CEE Program Manager Seth Wylie at swylie@cee1.org or 617-337-9288.

Sincerely,



Marc Hoffman
Executive Director