

December 17, 2010

Katharine Kaplan  
ENERGY STAR® Program  
U.S. Environmental Protection Agency  
Washington, DC 20036

Dear Katharine:

CEE appreciates the opportunity to provide comments on EPA's November 23 proposal to change the effective date for the ENERGY STAR Version 5 television specification to July 1, 2011. CEE is the binational organization of energy efficiency program administrators, whose members are responsible for ratepayer-funded efficiency programs in the United States and Canada. CEE members actively work to make ENERGY STAR a powerful asset and the relevant platform for energy efficiency across North America. The comments CEE submits today are intended to demonstrate our strong support for maintaining the value of the ENERGY STAR Program. The organizations listed at the end of this letter have chosen to indicate their individual support for these comments.

Given the limited amount of time for consideration of the proposed specification change, CEE has been unable to contemplate the full Program-wide implications of predicting specification levels for a particular point in the future and then also changing a previously announced date. We support EPA's attempt to maintain the label's relevance and live up to the ENERGY STAR brand promise. However, given the rapid advancements in televisions, we also recognize the dilemma of potentially alienating program partners and others that may have acted on previous predictions.

The prediction of future specification levels at a particular point in time represents a change to established practice of the ENERGY STAR Program, which has been to set specification levels as of a particular time based upon technical analysis to capture roughly the top 25 percent of available products in terms of efficiency. Given past investment made by an array of stakeholders over time, and the vast expertise and perspective they bring, we recommend a consultative engagement with stakeholders to assess how best the Program can be adjusted to advance efficiency and secure the collective support of stakeholders that makes this Program the success it is.

In the spirit of providing a possible solution for consideration, CEE offers a suggestion of a scheduled periodic review (e.g., annually), timed to coincide with industry product development cycles for products with rapid development cycles (televisions, and other electronic products). Rather than viewing such rapid adoption as an administrative failure, perhaps a broad messaging effort proclaiming advancement would serve the integrity aspect and also reinforce the greater

objective of the Program – energy savings. As always, stakeholder input through a consultative process is essential to the success of the Program, and CEE looks forward to engaging with EPA on this topic in the near future.

Without dismissing the importance of the Program-wide matter and how to best balance competing factors going forward, CEE is a committed ally to this successful Program and the advancement of efficiency in televisions. To this end, the CEE Consumer Electronics Committee convened managers of existing and potential television efficiency programs to assess the November 23<sup>rd</sup> proposal relative to individual program savings objectives and feasibility of modifying program support. From these perspectives, the Committee members support the aspects addressed by the November 23<sup>rd</sup> proposal.

Thank you again for the opportunity to comment. Once again, CEE strongly supports the ENERGY STAR Program and we are eager to work with you to consider how best to address these challenging issues. If you have any questions about these comments, please contact CEE Senior Program Manager Margie Lynch at [MLynch@ceel.org](mailto:MLynch@ceel.org) or 617-337-9277.

Sincerely,



Marc Hoffman  
Executive Director

**Supporting organizations**

- Avista Utilities
- BC Hydro
- Cape Light Compact
- DTE Energy
- Hydro-Québec
- MidAmerican Energy Company
- Midwest Energy Efficiency Alliance
- Natural Resources Canada
- New York State Energy Research and Development Authority
- Northeast Energy Efficiency Partnerships
- NSTAR
- Pacific Power
- PNM
- Public Service of New Hampshire
- Rocky Mountain Power
- The United Illuminating Company
- Western Massachusetts Electric Company