



July 2, 2009

Katharine Kaplan
ENERGY STAR® Marketing Manager
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Katharine:

On behalf of the Consortium for Energy Efficiency (CEE), I am submitting the following comments on the ENERGY STAR television specification. These comments were developed based on the CEE Consumer Electronics Committee's discussion of the Draft 2 Version 4.0 and Version 5.0 ENERGY STAR Television specifications distributed on June 5, 2009. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE incorporates by reference its comments from April 3, 2009 and May 18, 2009 regarding desired market penetration, qualification rate by screen size, luminance and the practice of setting future performance levels. We note that EPA's Draft 2 remains unchanged with regard to the concerns we have raised and would ask that EPA reconsider its proposals on these matters, particularly given the concerns expressed by manufacturer stakeholders at the June 24 stakeholder meeting regarding possible effects of the proposed luminance and Version 4.0 and 5.0 On Mode power level requirements.

Draft 2 does contain a new element on which CEE has not previously commented—a proposal to limit power consumption within Version 5.0 to a maximum of 108 Watts for screen sizes greater than or equal to 1068 square inches. CEE has not yet developed a consensus position regarding energy consumption caps within the ENERGY STAR Program. In past discussions, some Electronics Committee members have expressed support for the practice in the abstract given the continued growth in average screen size. Others have noted a concern that setting a cap for a future level may stifle technological innovation and the addition of features in televisions like DOCSIS and CableCard 2 that may provide added amenity and merit consideration of an additional energy allowance. We ask EPA to share with stakeholders its assessment of the potential implications of the proposed new approach given the rate of technology development and the technical and market trends likely to be in place in 2012.

CEE appreciates the ongoing opportunities EPA has provided to discuss this specification revision and to provide comment. CEE looks forward to continuing to work with EPA and television industry stakeholders in the upcoming months.

Sincerely,



Marc Hoffman
Executive Director

Supporting Organizations

Avista Utilities

BC Hydro

Cape Light Compact

Efficiency Vermont

New York State Energy Research and Development Authority

Northeast Energy Efficiency Partnerships

NSTAR

San Diego Gas and Electric Company

Xcel Energy