



May 18, 2009

Ms. Katharine Kaplan
United States Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Ave NW
Washington, DC 20460

**Subject: Follow-up Comments to the Draft 1 Version 3.1 ENERGY STAR
Television Specification.**

Dear Katharine Kaplan:

On behalf of the Pacific Gas and Electric Company (PG&E), Sacramento Municipal Utility District (SMUD), and the Northwest Energy Efficiency Alliance (NEEA), we respectfully submit comments in regards to the Draft 1 Version 3.1 ENERGY STAR TV specification.

As sponsoring members of the Business and Consumer Electronics Program, we are currently working with retailers and manufacturers to help consumers and businesses become more informed about the benefits of purchasing energy-efficient electronic products. The Program provides marketing support to encourage manufacturers and retailers to educate, promote and sell the most energy-efficient televisions, desktop computers and monitors. Consumers will see co-branded signs on the most energy-efficient and cost-saving electronic products in participating retail stores. We value our strong partnership with the U.S. Environmental Protection Agency's ENERGY STAR program and currently promote products that meet and exceed ENERGY STAR specification levels.

Televisions are a key product category for the Program since they represent a prominent and growing source of end-use energy consumption. Current growth rates indicate that televisions are on a trajectory to become a dominant—and in some cases the leading—residential end-use. Thus, we have a strong interest in supporting a new ENERGY STAR specification that successfully distinguishes the most energy efficient TVs on the market.

We currently support the Tier 2 and Tier 3 On Mode power consumption levels presented in Draft 1 Version 3.1. We applaud the EPA's intent to establish levels that qualify the top performing energy efficient models *when the specification goes into effect*. Given the pace of innovation in the TV market, it is necessary to consider what's available in the market now while also anticipating efficiency advancements that will be made between now and the effective dates. Thus far, the EPA has done an admirable job in trying to

meet this objective by collecting various information and feedback from multiple stakeholders.

As we presented at the April 24, 2009 stakeholder meeting, we will aim to align the Business and Consumer Electronics program incentives with future ENERGY STAR levels.¹ If the current Tier 2 and Tier 3 levels are adopted, we are strongly considering offering incentives for TVs that meet Tier 2 levels as early as January 1, 2010. In addition, we will consider offering a higher per unit incentive for TVs that meet the more stringent Tier 3 level. The final decisions for incentive levels will be made later in 2009 and will be informed by the ongoing ENERGY STAR process in addition to our internal market assessments.

We think there is significant value in establishing two future tier levels at the same time. Based on recent experience from the Tier 1 process, it is clear that manufacturers are committed to having products that meet Energy Star levels. (Note: since November 2008, manufacturers have certified over 870 TVs that meet the Tier 1 levels). Thus, having two future levels gives manufacturers an efficiency roadmap to inform their product development process. Adopting two future tiers enables ENERGY STAR to further encourage the advanced technologies entering the market now and in the near future. As the current proposed tiers go into effect, future tiers should be developed to continually enable industry to push for advanced technologies. This multi-tiered approach could then continue on an ongoing basis as a way to protect the ENERGY STAR brand and to accelerate the most efficient products to the market. These new efficient technologies include LED backlit LCDs, OLEDs, and next generation plasmas that are being promoted and showcased by several major TV manufactures.²

We believe the Tier 2 and Tier 3 levels are appropriate but recommend that the EPA consider moving up the effective dates earlier than the proposed 5/1/10 for Tier 2 and 5/1/12 for Tier 3. Our recommended dates are 1/1/10 for Tier 2 and 1/1/11 for Tier 3. Given the historical Tier 1 adoption precedent and the emerging efficient technologies, we think these accelerated effective dates will better ensure ENERGY STAR relevancy.

We recognize that future tier levels need to be anticipatory; thus, we encourage the EPA to establish a review schedule in advance of the effective dates to ensure that the level is appropriate based on market trends. This review process should occur at least annually and if possible more frequent (e.g., every 6 to 9 months). This schedule would facilitate continually improving reach targets for industry and utilities to consider.

In addition to the On Mode levels and timing, we look forward to participating in future conference calls and meetings over the next few weeks and months to help ensure that

¹ For the full presentation, see

http://www.energystar.gov/ia/partners/prod_development/revisions/downloads/tv_vcr/PG_E_Presentation.pdf.

² See slides 6-10 of the following presentation:

http://www.energystar.gov/ia/partners/prod_development/revisions/downloads/tv_vcr/PG_E_Presentation.pdf.

other revision considerations (e.g., luminance issues, automatic brightness control requirements, and download acquisition mode additions, etc.) are addressed appropriately.

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

Sincerely,

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