2026 ENERGY STAR® Program Transition Plan

Finalized on August 28, 2026

U.S. Environmental Protection Agency &

U.S. Department of Energy

TABLE OF CONTENTS

I. EXECUTIVE SUMMARY 3

II. BACKGROUND 5

III. OBJECTIVE 5

IV. TRANSITION LEADERSHIP & TRANSPARENCY 5

V. WORKSTREAM 1: KNOWLEDGE TRANSFER AND CONSOLIDATION OF PROGRAMMATIC LEADERSHIP AT DOE 6

VI. WORKSTREAM 2: LEGAL TRANSFER FROM EPA TO DOE OF THE ENERGY STAR TRADEMARK, EPA-ONLY PARTNERSHIP AGREEMENTS, AND ENERGY STAR AGREEMENTS WITH FOREIGN GOVERNMENTS 10

VII. WORKSTREAM 3: TRANSFER OF THE HOSTING OF ENERGY STAR IT SYSTEMS AND DATA 11

VIII. ADDITIONAL EXECUTION CONSIDERATIONS 12

I. EXECUTIVE SUMMARY

In accordance with a Memorandum of Agreement (MOA) signed on March 3, 2026, this Transition Plan aims to facilitate the transfer of primary leadership of the ENERGY STAR program from EPA to DOE.

Transitioning the ENERGY STAR program is complex and will involve several steps, strategically grouped in three workstreams phases. The agencies commit to work together to fully complete this transition no more than twelve months after the finalization of this plan.

Workstream 1: Knowledge transfer and consolidation of programmatic leadership at DOE

- *Knowledge transfer:* EPA has already begun sending to DOE ENERGY STAR documentation, resources, and standard operating procedures covering trademark and ownership, partnership agreements, the IT portfolio and data, agreements and other arrangements with foreign governments, certification, reporting, recognition, and outreach. The transfer of documents will be identified in the Trademark and Agreement Transfer Plan (discussed in Workstream 2). EPA will also provide DOE, at the time of the data transfer, with an inventory or log of all documents and data sets transmitted including any required handling instructions or markings (e.g., CUI or other protection requirements) sufficient for DOE to ensure appropriate management of program information.

- *Training and staffing:* EPA staff will provide training and assistance to DOE over the duration of this transition plan to facilitate a smooth transition and transfer continuity of current operations for the program. DOE will begin recruitment actions to staff the essential functions of the ENERGY STAR program.

- *Consolidation of programmatic functions and leadership at DOE*: This transition plan includes the major milestones to consolidate the leadership and execution of major ENERGY STAR programmatic functions at DOE within one month of the finalization of this plan, and/or by the trademark transfer date established in Workstream 2

Workstream 2: Legal transfer from EPA to DOE of the ENERGY STAR trademark, EPA-only partnership agreements[1], and ENERGY STAR agreements with foreign governments

- EPA's Office of the General Counsel and DOE's Office of the General Counsel are collaborating on the development of a detailed action plan for the transfer of the ENERGY STAR trademark, EPA-only partnership agreements, and ENERGY STAR agreements and other arrangements with foreign governments (hereafter referred to as the "Trademark and Agreement Transfer Plan"). DOE and EPA will finalize the Trademark and Agreement Transfer Plan by September 1, 2026. Transfer of control of the trademarks from EPA to DOE will not occur until after the Trademark and Agreement Transfer Plan is finalized, with the transfer date to be specified as part of the plan. The Trademark and Agreement Transfer Plan will reasonably include the trademark readiness and due diligence requirements identified by DOE's Office of the General Counsel, including documentation needed to maintain continuous quality control, monitoring, and enforcement of the ENERGY STAR trademarks.

- Further details on milestones and timelines will be included in that plan.

Workstream 3: Transfer of the hosting of ENERGY STAR IT systems and data

- Transferring the hosting of ENERGY STAR IT systems will take the longest amount of time. The ENERGY STAR IT Portfolio is a complex infrastructure of numerous tools, applications, and databases. It will take time for DOE to establish its own infrastructure to host the ENERGY STAR IT footprint in accordance with federal security and privacy policies and required authorizations to operate. This process is targeted for completion before July 2027.

[1] Most existing ENERGY STAR partnership agreements are already established as with both EPA and DOE. Only a small percentage of agreements are with just EPA and will need to be modified to include DOE.

II. BACKGROUND

On March 3, 2026, EPA and DOE entered into a new joint Memorandum of Agreement (MOA) establishing DOE as the lead federal agency and stipulating an orderly transition to be detailed in a transition plan within 90 days of the effective date, June 1, 2026. This document comprises that plan.

III. OBJECTIVE

Both EPA and DOE are committed to a successful transition and efficient continuity of operations for the program with minimal disruption to outside stakeholders and continued service to the American public. This plan transitions all components of the ENERGY STAR program no later than one year after the finalization of this plan.

The next twelve months are critical to ensuring a successful transition and ongoing operation of the ENERGY STAR program. Both agencies are committed to minimizing any disruptions to the 1,500 manufacturers, 1,200 retailers, 840 utilities, and $100 billion in private markets that depend on ENERGY STAR to save the equivalent of 13 percent of United States electricity use annually.

IV. TRANSITION LEADERSHIP & TRANSPARENCY

Congress will receive at least three business days prior notification before this transition plan is finalized. Upon finalization, EPA and DOE will send a joint email to ENERGY STAR partners.

This plan outlines three major workstreams. For each workstream, each agency will assign a co-lead to oversee the orderly transition and provide regular updates to leadership as outlined below. The co-leads will meet bi-weekly for the next three months and monthly as needed until 12 months after the finalization of this plan. At the beginning of each month, the co-leads for each workstream will submit to leadership at each agency[2] a progress review that includes:

- Milestone status: progress made against the milestones for the workstream.
- Progress updates: summarizing ongoing work in support of the milestones.
- Unforeseen challenges: any challenges or issues that have been identified with the plan to address.

[2] Agency leadership includes: EPA's Assistant Administrator for the Office of Air and Radiation; EPA's General Counsel; DOE's Assistant Secretary of Energy (EERE) for the Office of Critical Minerals and Energy Innovation; and DOE's General Counsel.

V. WORKSTREAM 1: KNOWLEDGE TRANSFER AND CONSOLIDATION OF PROGRAMMATIC LEADERSHIP AT DOE

This workstream is the foundation for all other elements of a successful program transition and thus has the earliest milestones. There are three main thematic and inter-related components:

- **Knowledge transfer:** EPA has already begun sending to DOE ENERGY STAR documentation, resources, and standard operating procedures covering trademark and ownership, partnership agreements, the IT portfolio and data, agreements and other arrangements with foreign governments, certification, reporting, recognition, and outreach. The transfer of the files will be identified in the Trademark and Agreement Transfer Plan (discussed in Workstream 2). Any item requiring additional time for transfer will be flagged by EPA. EPA will also provide DOE, at the time of the data transfer, with an inventory or log of all documents and data sets transmitted including any required handling instructions or markings (e.g., CUI or other protection requirements) sufficient for DOE to ensure appropriate management of program information. As documents may be submitted in batches, this will be a running log maintained over the course of the transition.

- **Consolidation of programmatic functions and leadership at DOE:** The ENERGY STAR program has long been a program jointly executed by EPA and DOE. Per the MOA, DOE is now the lead Federal agency for the ENERGY STAR Program. This transition plan includes the major milestones to consolidate the leadership and execution of major ENERGY STAR programmatic functions at DOE by the trademark transfer date established in Workstream 2.

- **Training and staffing:** EPA staff will provide training and assistance to DOE over the duration of this transition plan to facilitate a smooth transition and transfer continuity of current operations for the program. Initial training will focus on the IT portfolio and data, certification, reporting, recognition, and outreach. DOE will begin recruitment actions to staff the essential functions of the ENERGY STAR program.

Knowledge Transfer Milestones: EPA will provide DOE with:

- Copies of all contracts and contractor statements of work EPA used to support the ENERGY STAR program since October 1, 2023;
- Partnership agreements including all licenses and/or agreements to use the trademark;
- The technical background/status of all ENERGY STAR specifications and scores and the standard operating plans (SOPs) associated with all certification processes, including:
    - All supporting documents associated with current specifications;
    - All SOPs associated with administering certification and verification;
    - Access to the systems required to administer certification; and
    - Training on systems and procedures to facilitate the transition.

- The relevant documentation of the process of engaging with stakeholders during specification[3] development.

- All information, resources, and mechanisms necessary to conduct effective trademark maintenance, monitoring, and enforcement actions, including but not limited to:

    - Existing SOPs related to monitoring and enforcement of the trademark; and

    - Information/files pertaining to potential trademark infringement and open enforcement cases. Included with the open enforcement cases, EPA will transfer settled cases from 2015-2025 such that DOE will gain an understanding of the ENERGY STAR program's approach to enforcement settlements.

- Documentation of agreements and other arrangements with foreign governments so that DOE, with assistance from EPA and the Department of State, as necessary, can work with partner governments to transition these agreements and/or negotiate future agreements or other appropriate arrangements.

- Access to ENERGY STAR IT systems for:

    - ENERGY STAR Connect (ES Connect) partner database, which includes comprehensive lists of all stakeholders for each area of the program.

    - Accessing emails to send communications to the full ENERGY STAR network.

    - Modifying web content (which does not require hosting the website).

- Data and documentation necessary to provide support to existing partners and to onboard new partners, including but not limited to:

    - Access to details of the agreements as documented in the IT system;

    - Details of all existing partnership types, including governing documents;

    - Copies of all partnership agreements;

    - SOPs associated with onboarding and maintaining partners of each type, including protection of the data, marking and storage;

    - SOP for the vetting of prospective partners; and

    - SOP for Unit Shipment Data collection.

[3] For the purposes of this document, Specification refers not only to Product and Homes specifications but also to the ENERGY STAR score for commercial buildings and the Energy Performance Indicators (EPIs) for industrial plants.

- A comprehensive list of all ENERGY STAR data sets and the data protections associated with each of these data sets.

- A full export of requirements documentation from the Atlassian tool suite, which DOE can import to its chosen management tool suite.

- Prior program activity details, including: relevant business plans and program briefings; evaluations for potential program changes, such as potential products to sunset, specifications/scores/EPIs most in need of updating; and all prior fee and licensing evaluations.

- SOPs and planning documents relating to outreach to consumers and key stakeholders, training meetings, and web and social media strategies since October 1, 2023.

- The SOP and 2024 documents associated with Partner of the Year awards.

- SOPs and planning documents relating to the ENERGY STAR brand, outreach and communication materials, and utility programs associated with the ENERGY STAR brand since October 1, 2023.

- The information and materials necessary to conduct ENERGY STAR training, including on Portfolio Manager.

- Program impact methodologies, data, analyses, modeling, results, and reports.

Programmatic Function Milestones:

- DOE will lead future ENERGY STAR program updates and will continue to consult with stakeholders as needed.

- DOE leads ENERGY STAR tool operations, maintenance and development, even if the tool itself has not migrated. DOE will direct required changes in the IT systems to align with any future program updates, subject to the scope and budget of EPA's IT contract.

- DOE establishes mechanism(s) able to conduct effective trademark monitoring and enforcement.

- DOE establishes capabilities to oversee the processing of new partnership agreements and respond to partner inquiries.

- DOE expands capabilities to lead training and meetings as needed for the program.

- EPA transfers the energystar.gov domain registration and ownership of all ENERGY STAR social media accounts to DOE.

- In compliance with the Paperwork Reduction Act, data collected across ENERGY STAR is covered under three ICRs. DOE and EPA will coordinate with OMB on these ICRs.

- OMB Control Number: 2060-0347 (ENERGY STAR Commercial & Industrial Program)
- OMB Control Number: 2060-0528 (ENERGY STAR Products Program)
- OMB Control Number: 2060-0586 (ENERGY STAR Residential Program)

Additional Background on ENERGY STAR Certification

ENERGY STAR certification is the process by which specific products, homes, buildings, and plants demonstrate that they meet ENERGY STAR specifications, provide appropriate documentation, and obtain the ability to use the ENERGY STAR mark. For the purposes of this document, Specification refers not only to Product and Homes specifications but also to the ENERGY STAR score for commercial buildings and the Energy Performance Indicators (EPIs) for industrial plants. The full certification component includes the development of the specifications and the actual certification and reporting processes. Each of these areas of certification are performed differently for each area of the program (Products, Homes, Commercial Buildings, and Industrial Plants).

For each program area, the transition of Specifications includes providing DOE with documentation of all current and in progress specifications as well as historic specifications. EPA has not been engaged in updating specifications since early 2025. Therefore, the transition will also include documentation of known outstanding issues to be addressed as specifications are reviewed by DOE.

For each program area, the transition of Certification & Reporting Processes includes documentation of the process by which a product/home/building/plant obtains certification. These processes outline the roles of different parties including manufacturers, labs, certification bodies, homebuilders, building owners/operators, professional engineers, registered architects, etc. For Products, the process of certification relies on Certification Bodies that verify criteria and report certified models to EPA. For New Homes, the process of certification relies on Home Certification Organizations, who track and report on new homes quarterly. For commercial buildings and industrial plants, building owners/operators report data directly to EPA with a review and stamp from a licensed professional (e.g., Professional Engineer).

Additional Background on Recognition and Outreach

A large part of the ENERGY STAR program involves recognition, education and outreach. The strategy and scope of these activities is not dictated by the legislative authority for the program or the trademark. Transition for these areas will primarily consist of providing documentation for how work has historically been conducted, including details on outreach to consumers and key stakeholders, training programs offered, meetings convened, web and social media strategies, etc.

VI. WORKSTREAM 2: LEGAL TRANSFER FROM EPA TO DOE OF THE ENERGY STAR TRADEMARK, EPA-ONLY PARTNERSHIP AGREEMENTS, AND ENERGY STAR AGREEMENTS WITH FOREIGN GOVERNMENTS

EPA's General Law Office and DOE's Office of the General Counsel are collaborating on the development of a detailed action plan for the transfer of the ENERGY STAR trademark, EPA-only partnership agreements, and ENERGY STAR agreements with foreign governments (hereafter referred to as the "Trademark and Agreement Transfer Plan").

ENERGY STAR Trademark: The ENERGY STAR program trademarks are the foundation of the program and the basis for the program's partnership agreements. All service and certification marks covered by the ENERGY STAR program are registered USG-owned trademarks licensed by EPA. EPA is obliged to both use the trademarks and protect them from unauthorized uses. EPA has licensed its trademarks to thousands of businesses/partners that meet ENERGY STAR certification standards, through signed Partnership Agreements. As ENERGY STAR partners, these organizations must abide by EPA's ENERGY STAR Logo Use Guidelines for the use of the ENERGY STAR name and all forms of its marks. To use the ENERGY STAR certification marks, the ENERGY STAR partner must also comply with product-specific certification standards, which are on file with the USPTO registrations and are public record.

Partnership agreements: Through ENERGY STAR, EPA and DOE have entered into Partnership Agreements with thousands of companies, currently authorized to use the ENERGY STAR mark. There are over 15,000 active partners and over 10 partnership types including but not limited to: Product Brand Owners, Certification Bodies, Labs, Product Retailers, Home Upgrade Partnership, Commercial Building Owner and Managers, Residential Homebuilders, and Utilities and Energy Efficiency Program Sponsors. Most existing ENERGY STAR partnership agreements are already established with both EPA and DOE. Only a small percentage of agreements are with just EPA and will need to be modified to include DOE.

ENERGY STAR agreements and other arrangements with foreign governments: EPA has agreements with three countries regarding ENERGY STAR: Canada, Switzerland, and Japan. All three countries leverage these agreements to sell ENERGY STAR certified products (or a subset of products). The scope for Canada is more extensive. In addition to the agreements authorizing use and oversight of the mark in Canada, EPA also facilitates certification and listings of products on the energystar.gov website. In addition, Canada has a special agreement through a cooperative research and development agreement (CRADA) through which it funds Canadian-specific features and metrics within the ENERGY STAR Portfolio Manager tool. Data on Canadian buildings is segregated in its own database and is owned by Natural Resources Canada (NRCan), not EPA. EPA will assist DOE in working with United States Governments to decide how to move forward with existing agreements.

DOE and EPA will finalize the Trademark and Agreement Transfer Plan by September 1, 2026. Transfer of control of the trademarks from EPA to DOE will not occur until after the Trademark and Agreement Transfer Plan is finalized, with the transfer date to be specified as part of the plan. The Trademark and Agreement Transfer Plan will specify action items under this plan that will need to be complete before trademark transfer can occur. Details on milestones will be

included in that plan to achieve the following **final outcomes, listed below, on a schedule to be determined in that plan**:

- DOE accepts control of all ENERGY STAR trademarks registered with the United States Patent and Trademark Office (USPTO) and the Canadian Intellectual Property Law Office (CIPO), including necessary filings and fees.

- DOE is actively monitoring and enforcing all ENERGY STAR trademarks.

- ENERGY STAR agreements between EPA and Canada, Switzerland, and Japan have been appropriately transitioned to DOE, resulting in existing agreements either being transferred to DOE, terminated and replaced with a new agreement between each foreign partner and DOE, or reaching their expiration date. This may also require DOE and Canada to negotiate an appropriate agreement to replace the existing EPA/NRCan CRADA for the Portfolio Manager tool and transition the associated database.

VII. WORKSTREAM 3: TRANSFER OF THE HOSTING OF ENERGY STAR IT SYSTEMS AND DATA

Transferring the hosting of ENERGY STAR IT systems will take the longest amount of time. The ENERGY STAR IT Portfolio is a complex infrastructure of numerous tools, applications, and databases. In addition to the technical logistics of migrating this volume of information, there are data privacy, software ownership, and records retention questions that must be addressed. In addition, there is important data that exists outside of the IT Portfolio, such as Unit Shipment Data and Industrial Certification Data. For DOE to accept the IT assets associated with ENERGY STAR, DOE will need to establish a secure IT environment that meets applicable NIST and DOE security and privacy standards and has an Authorization to Operate.

This process is targeted for completion before July 2027. The successful outcome of this workstream is for DOE to be hosting and managing the full IT environment in a DOE computing environment with a DOE Authorization to Operate. EPA will have transferred all required program data and software to DOE in accordance with relevant federal security and privacy requirements.

Prior to system migration, EPA will grant DOE access to all ENERGY STAR IT systems to support the transfer of knowledge and daily operations milestones in the first workstream. With access to the IT systems, DOE will be able to begin to administer many parts of the program directly, while standing up the capacity to host the full IT environment. However, to ensure a smooth transition of responsibility for the IT systems, DOE and EPA will coordinate closely regarding funding and contractor oversight.

The ENERGY STAR IT Portfolio includes several tools that include numerous Application Programming Interfaces and interconnections. Because there are so many IT components, they will be migrated in phases. Before full migration, DOE will be granted appropriate access to oversee tool maintenance and development and run program processes using these tools before the IT systems have fully migrated.

Milestones for EPA transferring the hosting of ENERGY STAR IT systems and data (before July 2027):

- ENERGY STAR website and Drupal Content Management system to DOE.
- ES Connect (including MESA, OPA, and HOST) to DOE.
- ENERGY STAR Portfolio Manager to DOE.
- Product Finder, the Qualified Product Exchange, the Incentive Management Platform and other miscellaneous tools to DOE.
- Business Intelligence Data Warehouse to DOE.
- ENERGY STAR Help Desk to DOE.
- Additional ENERGY STAR Data Assets, including Unit Shipment Data; Industrial certification data; and Program Savings data.
- EPA reviews, identifies, and transfers other datasets to DOE that are necessary to run the program, as well as an inventory.

VIII. Additional Execution Considerations

To execute the activities outlined in this transition, both DOE and EPA will need to develop internal plans to track and manage their respective activities. Each agency will need to identify and adhere to appropriate laws, regulations, and agency-level policies associated with data, IT, external engagements, contracting, and other processes that will be involved in this transition.

DOE and EPA may share information about strategies and the resources needed to accomplish these activities, but by definition these activities are the responsibility of each agency rather than a shared part of the transition. For example, EPA will share its draft statement of work (SOW) for IT Procurement with DOE as a reference point. However, DOE is responsible for developing and executing its IT procurement strategy with the finalization of this transition plan.

Each agency will also be responsible for identifying the resources required to complete its obligations under this transition including staff, contracting vehicles, IT services/licenses, and financial resources.

A. Funding

EPA's Fiscal Year 2026 appropriations, Pub. L. No. 119-74, directed funding for the ENERGY STAR program. EPA's Fiscal Year 2026 appropriations are being used for ENERGY STAR operations and will fund transition activities. The long-term success of the program depends on adequate funding. To that end, EPA will estimate unspent FY26 ENERGY STAR

appropriations and send those funds to DOE via reimbursable authority or interagency agreement.

With existing Fiscal Year 2026 appropriations, DOE will take financial responsibility for the ongoing operation and oversight of the ENERGY STAR Program going forward at the end of EPA's financial responsibility, as determined by the provisions above. Future agreements will be established if Congress appropriates additional funds to EPA for ENERGY STAR.

B. Staffing

Leveraging the existing expertise of EPA federal staff and contractors will be essential to a successful transition and to streamlining program execution to save American taxpayers. EPA experts will provide critical training and support to DOE staff throughout the transition to transfer knowledge of documents and processes DOE needs to assume operations for the program. The transition co-leads shall include updates on such critical needs in their regular updates. DOE will begin recruitment actions to staff the essential functions of the ENERGY STAR program.