

September 18, 2015

Ms. Ann Bailey  
ENERGY STAR Product Labeling  
Office of Air and Radiation  
U.S. Environmental Protection Agency  
Washington, D.C. 20460

Dear Ms. Bailey,

We would like to offer comments on behalf of the American Council for an Energy Efficient Economy (ACEEE) on the proposed *ENERGY STAR Most Efficient 2016 Recognition Criteria*. We appreciate the opportunity to comment on the draft recognition criteria, and value the work you have done to showcase the highest performing products in a number of product categories. We also appreciate the time you have taken to inform and educate stakeholders of the proposed changes to the criteria.

The American Council for an Energy-Efficient Economy is a nonprofit, non-partisan organization dedicated to advancing energy efficiency as a means of promoting both economic prosperity and environmental protection. ACEEE fulfills its mission by conducting in-depth technical and policy assessments; advising policymakers and program managers; working collaboratively with businesses, public interest groups, and other organizations; publishing books, conference proceedings, and reports; organizing conferences and workshops; and educating consumers and businesses.

We offer the following comments and suggestions that we believe will help enhance resources to make them best able to serve consumers, manufacturers, and utility program partners.

### **Energy efficiency program resources**

We commend EPA's commitment to provide and regularly maintain resources for utility energy efficiency program sponsors for use of Most Efficient criteria for incentive programs. We see maintenance of quality resources as a critical piece of the success of ENERGY STAR Most Efficient, and are in support of ensuring sufficient resources are provided to develop quality tools and resources for the Most Efficient designation.

In particular, we are in support of EPA's efforts to provide price and locator information for products on the ENERGY STAR Most Efficient website. We think this resource can be a valuable way for customers to more easily identify and shop for the most efficient products. We encourage EPA to work with retailers to build out resources for Most Efficient products that are representative of current availability and price.

### **Product availability**

ACEEE commends EPA's work with manufacturer partners to expand offerings in product categories with limited offerings. ACEEE encourages EPA to ensure products are available to consumers before products recognized in 2015 automatically receive recognition for meeting the 2016 criteria. Products that meet the new specification year's technical criteria, but are not available should not be automatically labeled with the 2016 Most Efficient designation. Since products receive the Most Efficient designation for a given year, each year's list of products

should represent an up-to-date, available list of products. One possible solution would be to require manufacturers to submit a list of products that are available on the market each year before products are granted the Most Efficient designation for that given year.

### **Product specifications**

ACEEE is in support of EPA's criteria updates and recommendations for all of the product categories. We support EPA's careful assessment of each product category to ensure the Most Efficient designation is representative of the highest performing products on the market today. We encourage EPA to assess each category on an annual basis to maintain the integrity of the ENERGY STAR Most Efficient brand in representing the best products on the market. We believe this helps utilities continue to offer incentive programs and reap savings from the most efficient products. We offer specific comments below on a number of product areas:

*Clothes washers.* ACEEE supports EPA's decision to set the same criteria for front loading and top loading clothes washers. This is consistent with EPA's intent to recognize only the most energy efficient products on the market, regardless of configuration. We notice there is limited diversity in clothes washer size for the products that currently qualify (most are very large), and we encourage EPA to explore ways to recognize more modestly sized clothes washers.

*Refrigerators.* We encourage EPA to consider how the federal refrigerator standards, which vary based on configuration and feature, impact the diversity of products that qualify for ENERGY STAR Most Efficient. Currently, only refrigerators with bottom-mounted freezers have qualified, based on meeting the requirement of 15% efficiency over the federal standard. The federal standard holds refrigerators with top-mounted freezers to more stringent energy use requirements than bottom-mounted freezer models.<sup>1</sup> This means that a top-mounted unit and a bottom-mounted unit of the same size and features could use the same amount of energy, but one would qualify under the Most Efficient specifications and one would not. We are supportive of recognizing the most efficient products on the market regardless of configuration, and we urge EPA to consider whether Most Efficient requirements based solely on the federal standard capture the most efficient products in this category. We also ask that EPA consider whether products that meet the requirements for Most Efficient based on the extra allowance for maximum energy use for through-the-door ice dispensing in the federal standard, warrant classification as Most Efficient.<sup>2</sup>

*New product specifications.* Lastly, we encourage EPA to explore the possibility of developing specifications for new product categories, where there is growing differentiation between products meeting ENERGY STAR specifications, such as dryers and computers (particularly desktop models). Our review of the current list of ENERGY STAR qualified dryers shows there is a significant range in energy consumption between models. In addition, there is an increasing number of energy efficiency programs offering incentives for dryers receiving the Emerging Technology Award, and we believe an established Most Efficient category with resources for energy efficiency programs would be beneficial.

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<sup>1</sup> See energy conservation standards on page 470 of the Code of Federal Regulations. 10 CFR 430.32 <http://www.gpo.gov/fdsys/pkg/CFR-2012-title10-vol3/pdf/CFR-2012-title10-vol3-sec430-32.pdf>

<sup>2</sup> Ibid.

Thank you for your consideration of these comments. ACEEE continues to support the ENERGY STAR Most Efficient program and greatly appreciates the opportunity to offer the comments provided above.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Cluett'.

Rachel Cluett  
Senior Research Analyst

A handwritten signature in black ink, appearing to read 'J. Amann'.

Jennifer Amann  
Buildings Program Director