



May 24, 2017

Ms. Verena Radulovic
Office of Air and Radiation
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: ENERGY STAR® Version 8.0 Television Specification Draft 2

Dear Ms. Radulovic:

This letter comprises the comments of the Pacific Gas and Electric Company, SoCalGas®, San Diego Gas and Electric, and Southern California Edison in response to the updates proposed in the U.S. Environmental Protection Agency (EPA) ENERGY STAR Version 8.0 Television Specification Draft 2 (referred to as “Version 8.0 Draft 2 Specification” throughout this letter).

The signatories of this letter, collectively referred to herein as the California Investor Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western United States, serving over 35 million customers. As energy companies, we understand the potential of the ENERGY STAR program to cut costs and reduce energy consumption while maintaining or increasing consumer utility of the products. For decades, the EPA’s ENERGY STAR program has provided large energy savings for our customers. We have a responsibility to our customers to advocate for meaningful efficiency requirements that identify the most efficient models available on that market and accurately reflect the climate and conditions of our respective service areas, so as to maximize ENERGY STAR’s positive effects.

The ENERGY STAR program for televisions has been overwhelmingly successful over the years in identifying the most efficient models on the market. It is a compliment to EPA, their manufacturing partners, and other stakeholders that meaningful requirements have been established; and industry has rapidly innovated to meet the program’s requirements and leverage the ENERGY STAR brand. We are encouraged by the almost immediate response of industry to implement cost-effective efficiency options when an ENERGY STAR specification is finalized. We thank EPA for considering our previous comments on the Version 8.0 Draft 1 Specification and offer the following supportive comments on Version 8.0 Draft 2 Specification.

1. The CA IOUs generally support EPA’s proposals outlined in the Version 8.0 Draft 2 Specification.

With the proposal outlined in Version 8.0 Draft 2 Specification 2, the CA IOUs believe that EPA is taking the first step in the proper implementation of energy saving features, such as automatic brightness control (ABC), to ensure the ENERGY STAR label remains meaningful and effective to our customers. EPA’s proposals in the Version 8.0 Draft 2 Specification addresses some of the concerns we outlined in previous

comments to preserve the energy savings and high performance of an ENERGY STAR television expected from our customers.¹

2. If a television is certified with the ABC feature enabled by default, the CA IOUs recommend that ABC should not be automatically disabled in any preset picture setting.

We continue to support EPA's proposal of limiting the conditions where ABC can be automatically disabled without the consumer knowing if the television is certified with the ABC feature enabled (thereby taking advantage of the ABC allowance as provided in the test procedure). We ask EPA to go one step further and require that ABC not be automatically disabled in any preset picture setting for televisions to be certified with ABC enabled by default.² Given that multiple prominent manufacturers are able to implement ABC in all preset picture modes, there is no technical reason or picture viewing limitation for not implementing ABC properly in all preset modes.

We believe this recommendation will limit the opportunities for a consumer to disable this energy saving feature without their knowledge. Multiple major manufacturers are doing this already with no sacrifice to picture quality.³ If there is a reason ABC needs to be disabled or would not meet the proposed levels in a particular preset picture setting, we look forward to reviewing the information or data provided from manufacturers per EPA's request.

We do not believe requiring ABC being enabled in all preset modes is overly prescriptive since manufacturers always have the option of certifying their television with ABC disabled if for some reason they do not wish to implement this feature in all preset picture modes. The CA IOUs also support the updated minimum brightness level in the default setting of 125 nits for televisions certified with ABC enabled by default, to ensure a positive customer experience with the ABC feature. This minimum level will ensure TVs are not shipped too dim.

3. The CA IOUs support EPA's proposal of requiring any energy saving feature enabled during testing to be enabled in each preset picture setting.

We support the provisions EPA included in Sections 3.2.5 and 3.2.6 to require persistence of energy saving features to prevent certification of a televisions with certain features enabled (or disabled) to achieve a favorable power rating only to be modified automatically during typical viewing unbeknownst to the end user.

4. The CA IOUs support EPA's proposal to include home theater displays in the scope of this specification.

Since home theater displays are intended to be used as televisions, we support EPA's proposal to include home theater displays in this specification. As we have stated previously, EPA should study the power requirements of these tuner free displays for the Version 9.0 Specification update to determine the need to set separate power requirements from televisions.

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<https://www.energystar.gov/sites/default/files/CA%20IOU%20Comments%20on%20ENERGY%20STAR%20Televisions%20Version%208.0%20Draft%201%20Specification.pdf>

² With the exception of retail configurations or when displaying true high dynamic range (HDR) content, since both of these modes may have brightness requirements that are not compatible with the ABC feature.

³ LG, Sony, and Phillips.

5. In the Version 9.0 Specification , EPA should reduce the on-mode power allowance for ultra-high definition televisions (i.e., native vertical resolution greater than or equal to 2,160 lines).

In our previous comments, we submitted data analysis that justified modification of the generous 50% on mode power adder for ultra-high definition (UHD) televisions. We understand EPA’s position that the proposed modifications in the Version 8.0 Draft 2 Specification will impact the overall power draw reported for televisions that may affect overall qualifications rates. We recommend that EPA closely track the power consumption of UHD televisions as soon as models qualify for the Version 8.0 Specification, and make it a priority to update the adder in the Version 9.0 Specification. If the timeline for the Version 8.0 development process is extended for any reason, the UHD power allowance update should be included in the scope, since data analysis is currently available to support a significant reduction.

6. The CA IOUs recommend data collection of power draw of high dynamic range (HDR) models displaying HDR content and upscaled standard dynamic range content.

EPA should start collecting performance data for HDR televisions with the intention of assessing the data for the Version 9.0 Specification. We also support EPA’s proposal to publicly display power draw values for HDR models displaying HDR-upscaled content and native HDR content on the certified products list. As we have commented previously, the market share of HDR models is expected to increase dramatically, by almost six-fold in 2017 and beyond.

In conclusion, we would like to reiterate our strong support of EPA’s proposals outlined in the Version 8.0 Draft 2 Specification. We thank EPA for the opportunity to be involved in this process and encourage EPA to carefully consider the recommendations outlined in this letter.

Sincerely,



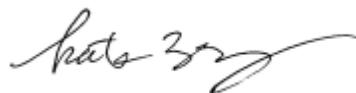
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