

November 8, 2017

Verena Radulovic
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Radulovic:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR® Television Specification Version 8.0 Revised Final Draft, released by the Environmental Protection Agency (EPA) on October 24, 2017.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 46 US states, the District of Columbia, and seven Canadian provinces. In 2015, CEE members directed over \$7 billion of the \$8.7 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the United States and Canada. We appreciate the opportunity to provide these comments.

CEE Supports the Inclusion of Home Theater Displays and EPA Plans to Message about Product Differences on the ENERGY STAR TV Webpages

CEE has observed that with the prevalence of television programming provided by cable and satellite boxes or streaming devices,¹ a prominent television manufacturer, VIZIO, has decided to do away with built-in tuners in their televisions.² CEE is also familiar with the Department of Energy (DOE) definition that states that televisions are products designed to produce dynamic video that contain an internal TV tuner encased within the product housing. Per this definition, it is our understanding that with the removal of built-in tuners, these products can no longer be referred to as “televisions” and must be called “displays.” Given what CEE recognizes to be a significant sales volume of tuner-free products, and the potential for significant energy savings, CEE supports the EPA proposal to include home theater displays within the program.

While CEE supports inclusion of this product category, we are also concerned about the lack of consumer understanding regarding what it means for a television to be tuner-free or called a display. In an effort to minimize consumer confusion and protect the ENERGY STAR brand, CEE believes it to be prudent to pay careful attention to how these products are messaged to consumers so they fully understand what they are purchasing. In the absence of definitive research, CEE encourages the program to leave messaging decisions to the manufacturer, given branding and consumer complaint exposure implications. In conjunction with manufacturer messaging, we also support EPA plans to include messaging about the difference between televisions and displays on the ENERGY STAR product webpages for televisions.

CEE Supports EPA Efforts to Address the Persistence of Energy Savings Features across Picture Settings

Based on DOE and Natural Resources Defense Council (NRDC) examination of the features of different manufacturers' picture settings, we share EPA concern that energy saving features like automatic brightness control (ABC) are being turned off in many TV preset picture settings. ABC is an important energy saving feature; NRDC laboratory testing found that 55-inch 4K televisions

¹ According to press release from the Consumer Technology Association in 2014, only six percent of U.S. households with a television rely exclusively on an antenna for television programming reception and is about to be eclipsed for the first time ever by the percentage of households relying only on the Internet for TV programming (five percent). https://www.cta.tech/News/Press-Releases/2014/June/OTA-Study_060514.aspx

² According to the VIZIO website, all VIZIO SmartCast™ 4K Ultra HD displays are tuner-free. “Tuner Free | VIZIO,” VIZIO, accessed November 7, 2017, <https://www.vizio.com/tuner-free>.

use an average of 50 percent more power with ABC off than with it on.³ CEE therefore supports EPA efforts to increase the persistence of ABC across picture settings and maximize energy savings realized by consumers.

CEE Supports Additional Luminance Requirements for ABC-Enabled TVs to Protect Consumer Amenity

CEE supports the EPA proposal to create two additional luminance requirements to provide a positive consumer experience with ABC. We agree that requiring a minimum level of luminance is important to ensure that implementation of ABC does not yield picture settings that are too dim, therefore encouraging users to maintain use of the default preset picture setting.

CEE Supports Limiting Revisions to Currently Proposed Changes with the Understanding That the Efficiency Criteria and Ultra High Definition Allowance Will Be Reassessed Immediately upon Receipt of New Performance Data

As stated above, CEE strongly supports EPA efforts to address the persistence of energy saving features like ABC and the need for luminance requirements to protect the consumer experience with ABC. Based on insights provided by EPA and responses from manufacturers, we anticipate that the addition of luminance requirements for ABC-enabled televisions, as well as removal of motion detection dimming (MDD) during testing, will likely increase the reported energy consumption of ENERGY STAR televisions. CEE agrees with EPA that the impact of these proposed changes needs to be fully understood prior to making revisions of the efficiency criteria, including a reduction of the allowance for ultra high definition (UHD) televisions. We believe these proposed changes to the Version 8.0 criteria will yield more accurate reporting of television energy use, and that EPA should base any changes to performance requirements on this data.

While having the most accurate energy use data is a critical precursor to revising the efficiency criteria and the UHD allowance, it is essential that the allowance is revised on a rapid timeline. In the ENERGY STAR television specification cover memo from September 2014, EPA indicates that the allowance for UHD models is intended to be in effect for a limited time, anticipating that as UHD models evolve, their energy efficiency will also improve, as was seen for HD models. Based on the fast-moving nature of the television market, the increasing prevalence of UHD models, the potential for increased energy savings, and manufacturers' expressed tolerance of a gradual

³ Natural Resources Defense Council, *The Big Picture: Ultra High-Definition Televisions Could Add \$1 Billion to Viewers' Annual Electric Bills*, November 2015, <https://www.nrdc.org/sites/default/files/uhd-tv-energy-use-report.pdf>.

reduction to the UHD allowance, CEE recommends that EPA reconsider the energy criteria for UHD televisions beginning no later than July 1, 2018, when the new, more representative energy use dataset will be available.

CEE would once again like to thank the EPA for the opportunity to comment on version 8.0 of the ENERGY STAR Television criteria. Please contact CEE Senior Program Manager Eileen Eaton at (617) 337-9263 with any questions about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Eileen Eaton".

Eileen Eaton
Senior Program Manager