

September 12, 2017

Ms. Ann Bailey
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Bailey:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the Draft 2018 ENERGY STAR® Most Efficient Criteria, released by the Environmental Protection Agency (EPA) on July 28, 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 US and Canada. We appreciate the opportunity to provide these comments.

CEE Supports the Growth and Proposed Changes to ENERGY STAR Most Efficient Criteria

CEE applauds the growth of the ENERGY STAR Most Efficient program over the years, and given the increasingly ambitious savings goals of CEE members, we greatly value the role Most Efficient plays in the market identifying the best of the best products. As with CEE tiered specifications, establishing a set of recognized higher efficiency levels serves to provide a clear target for leading manufacturers to pursue. The Most Efficient label is an important tool because it provides valuable information and can influence the purchasing decisions of early adopters of highly efficient products. Given that these early adopters play an important role in shifting markets towards greater efficiency, we appreciate enhancements made to the ENERGY STAR Most

Efficient website providing real-time data on product price and location features. We believe these modifications will boost the label's exposure and market share and better enable CEE members to promote products that meet the Most Efficient requirements. Member promotion helps drive sales, which can decrease production costs and allow the most efficient products to become mainstream.

CEE supports the continuous updating of the Most Efficient criteria as appropriate, and we are pleased to see the ongoing EPA commitment to reviewing the Most Efficient criteria annually. Having up-to-date specifications that continue to reflect the top performers is important to develop and maintain the strength of the Most Efficient brand. We are supportive of the proposed 2018 ENERGY STAR Most Efficient criteria and their alignment with CEE tiers. In particular, we are pleased to see that the proposed criteria for clothes washers greater than 2.5 cu. ft. align with the current CEE Tier 3 performance requirements. We also support retaining alignment with CEE Tier 2 and 3 requirements for central air conditioners, gas powered boilers and furnaces, and refrigerators. We are excited to see the addition of dehumidifiers as a 2018 product category, given that it represents a new savings opportunity for CEE members with dehumidifier programs. Lastly, we are interested in seeing televisions reincorporated into the Most Efficient program once Version 8.0 of the ENERGY STAR television specification is finalized, and we look forward to commenting on a future Most Efficient proposal for televisions.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski".

Ed Wisniewski
Executive Director