

ENERGY STAR® Most Efficient 2016 Stakeholder Comments		
Topic	Comment Summary	EPA Response
<b>General</b>		
ENERGY STAR Most Efficient Program	Three stakeholders enthusiastically support EPA's efforts in the ENERGY STAR Most Efficient program.	EPA appreciates the comments.
	Two stakeholders support EPA's efforts to review the ENERGY STAR Most Efficient criteria on an annual basis and believes that practice should continue. One stakeholder supports the development and maintenance of tools, like enhancement of the Most Efficient web page to include price and location information, that add value to the Most Efficient designation. This stakeholder encourages EPA to work with retailers to build out tools like this.	EPA intends to continue to build on the success of the ENERGY STAR Most Efficient program as consumers, some manufacturers, and efficiency sponsors alike have noted its value in the market. EPA is committed to building out tools to support Most Efficient and looks forward to working with retailers and other partners to enhance the value of such tools to consumers.
	One stakeholder asks EPA to ensure 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.	EPA agrees that it is very important for the Most Efficient list to highlight products that are available for sale. EPA reviews all product listings to ensure availability.
	One stakeholder raised concerns with the ENERGY STAR Most Efficient program, the suitability of the criteria, as well as the benefit to all stakeholders.	ENERGY STAR Most Efficient is designed to identify and advance highly efficient products in the marketplace. ENERGY STAR Most Efficient complements the base ENERGY STAR program, identifying for a set of early adopter consumers and energy efficiency program sponsors, the most energy efficient of the ENERGY STAR certified products. Designed for this audience, EPA sets criteria with efficiency prioritized above all else and understands from a range of stakeholders that this objective is being met.
Scope	Four stakeholders suggest that EPA should expand the scope of the ENERGY STAR Most Efficient program in 2016 to include new product categories, including commercial products, computers, and dryers.	EPA is interested in expanding the ENERGY STAR Most Efficient program to include new product categories where it is possible to differentiate among ENERGY STAR products and where a receptive audience is found. EPA will evaluate the proposed products for future inclusion in Most Efficient.
<b>Refrigerators/Freezers</b>		
Minimum Performance Levels	Three commenters support EPA's decision to maintain the 2015 ENERGY STAR Most Efficient criteria for refrigerators/freezers. Two stakeholders ask EPA to consider increasing the efficiency levels for 2017 ENERGY STAR Most Efficient.	EPA appreciates these comments and will continue to monitor product efficiency and availability in light of the 2014 transition, and consider further changes to the ENERGY STAR Most Efficient Refrigerators specification on an annual basis.
Scope	One stakeholder asks EPA to consider whether Most Efficient requirements based solely on the federal standard capture the most efficient products in this category, including top-mounted freezer models. The stakeholder also notes EPA should 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.	In light of comments received and in line with the intention of ENERGY STAR Most Efficient designation, EPA has adjusted the refrigerator/freezer criteria to allow for greater recognition of the significant energy savings associated with top freezer models. On average, an ENERGY STAR top freezer model consumes about 375 kWh/year, while standard models of other configurations consume about 700 kWh/year -- a notable difference in energy use. At the same time, there is little differentiation among ENERGY STAR top freezers (i.e. all perform very close to the required 10% above minimum efficiency standards.) As such, EPA is proposing to recognize all certified top freezers as ENERGY STAR Most Efficient in 2016. Regarding icemakers, products eligible for ENERGY STAR Most Efficient recognition must be 15% better than the federal standard, with no adder provided for icemakers.
<b>Central Air Conditioners &amp; Heat Pumps</b>		
Minimum Performance Levels	One stakeholder supports the proposed ENERGY STAR Most Efficient criteria for ductless heat pumps.	EPA appreciates this feedback and support.
Low Temperature Performance	One stakeholder notes that there are burgeoning low-temperature performance standards being developed but they are too nascent to include in the ENERGY STAR Most Efficient criteria for CAC/ASHPs.	EPA will monitor the development of these low-temperature performance standards.

Topic	Comment Summary	EPA Response
Messaging Criteria	One stakeholder supports EPA's decision to include system status and messaging criteria for ductless split air conditioners and heat pumps. This same stakeholder asks EPA to consider new requirements for geothermal heat pumps.	Thank you for your comment. The messaging criteria will ensure that the ENERGY STAR Most Efficient ductless minisplits are also the most user-friendly. Less than 60% of geothermal heat pump units meet the ENERGY STAR Most Efficient requirements. EPA will consider the need for tighter requirements for 2017.
Scope	One stakeholder asks EPA to change the wording of the heat pump requirement to make clear that the system status and messaging requirement applies to GHP as well.	Thank you for catching this error. EPA will correct it in the final criteria documents.
	One stakeholder suggests that EPA consolidate the criteria for ducted and ductless systems as they do not provide a different service to consumers.	Though ducted and ductless systems provide generally the same end service, the differences in installation complexity, initial cost, and applications can vary significantly. For these reasons, EPA has decided to retain the two sets of criteria for ENERGY STAR Most Efficient 2016.
<b>Boilers</b>		
Minimum Performance Levels	One stakeholder supports EPA's rationale behind maintaining the ENERGY STAR Most Efficient 2015 boiler criteria levels for 2016.	EPA appreciates this feedback and will monitor advances in technology and adjust the specification as necessary to ensure consumers receive a boiler that truly is the best of the best.
<b>Clothes Washers</b>		
Minimum Performance Levels	One stakeholder disagrees with EPA's proposal to not distinguish between top-load and front-load clothes washers in the ENERGY STAR Most Efficient criteria. The stakeholder notes that this approach is inconsistent with actions EPA has taken in its ENERGY STAR criteria and also with DOE regulations.	EPA and DOE work closely together in vetting the ENERGY STAR Most Efficient criteria. The ENERGY STAR Most Efficient initiative is a proving ground that aims to direct consumers to the best-of-the-best of ENERGY STAR, using as a foundation the analysis completed in developing ENERGY STAR specifications, and then applying our best technical expertise to craft criteria that reasonably reflect the top performers of ENERGY STAR while still offering a varied selection of products and brands. It follows that ENERGY STAR Most Efficient should only apply to the most efficient clothes washers, regardless of configuration. Moreover, the proposed requirement is a modest adjustment to the current criteria and aligns with the approach taken in CEE's specification thereby streamlining programmatic considerations for utility partners.
	Four stakeholders support EPA's decision to use the same criteria for top-load and front-load clothes washers in the ENERGY STAR Most Efficient criteria. One points out that this approach is more closely aligned with CEE.	EPA appreciates these comments and strives to align ENERGY STAR Most Efficient requirements with CEE criteria where appropriate.
	One commenter agrees that excluding small volume products at this time due to lack of data and efficiency differentiation for these products is appropriate. Another commenter encourages EPA to look at ways to recognize more modestly sized washers.	EPA will continue to watch for future efficiency opportunities in smaller volume washers and encourages partners to share their insights.
<b>Dishwashers</b>		
Minimum Performance Levels	Three stakeholders agree with EPA's decision not to revise the ENERGY STAR Most Efficient 2016 requirements for dishwashers.	EPA appreciates this feedback and support.
	One stakeholder noted general concern regarding the cleaning criteria. One commenter suggests that EPA review performance floor levels in future ENERGY STAR Most Efficient dishwasher criteria based on data received from partners. Another agrees with EPA's continued inclusion of a minimum cleaning performance requirement in the light, medium and heavy cycles.	EPA appreciates this feedback, will continue to evaluate the relationship between dishwasher energy use, water use and cleaning performance, and looks forward to reviewing cleaning performance data reported by partners for 2016 Most Efficient dishwashers.
<b>Televisions</b>		
Scope	Two stakeholders agree with EPA's proposal to not allow an energy allowance for UltraHD televisions.	EPA appreciates this feedback and support. EPA will revise the ENERGY STAR Most Efficient recognition criteria to capture the top performing TVs in the market as reflected in the Draft criteria. Based on ongoing trends in energy efficiency, EPA anticipates continued improvements in energy efficiency for TVs, especially in UHD TVs, where energy consumption has already decreased substantially since the first generation of UHD TVs were released.

Topic	Comment Summary	EPA Response
Minimum Performance Levels	Two stakeholders agree with EPA's proposed increases to the ENERGY STAR Most Efficient criteria for televisions. One of the stakeholders urges EPA to monitor new features in television software that may consume more energy.	EPA appreciates this feedback and strives to differentiate the top-performing products via the ENERGY STAR Most Efficient program. EPA's upcoming Version 7.0 Television specification sets energy limits on network functionality and thus all TVs that meet Most Efficient criteria will already meet stringent energy efficiency limits when network-connected. EPA will continue to monitor the market to assess the power consumption of any additional network-connectivity that is not already addressed by the specification for consideration in a future specification revision.
<b>Ventilating Fans</b>		
General	One stakeholder supports EPA's proposed criteria for ventilation fans, particularly regarding adding an efficacy requirement for higher fan speeds.	EPA appreciates this feedback and support.
Minimum Performance Levels	One stakeholder made three suggestions regarding the ENERGY STAR Most Efficient 2016 ventilating fans criteria: 1. There may be an inconsistency for multispeed fans to meet the 10 CFM/W limit at only the top speed. A few fans will meet the top speed, but fail the 10 CFM/W at lower speeds. 2. This specification should have some sort of 'blended' standard or possibly a similar standard to meet CFM/W at high, medium and low speeds or at the 40% - 60% of the maximum speed in order to reflect the way multispeed fans are used in the market. 3. ENERGY STAR Most Efficient ventilation fans should report some levels at 0.25 W.G.	EPA appreciates the commenter's interest in setting the requirement at a speed that is used most frequently. In reviewing the information submitted to EPA by certification bodies, EPA found little consistency in what is reported as "intermediate" speed. As such, the Agency will discuss how these speeds are chosen with stakeholders, and reconsider such a change in the context of both ENERGY STAR and ENERGY STAR Most Efficient for future years. Regarding the some levels at 0.25 W.G., EPA is continuing to work with the stakeholders to gather data and additional information needed to consider this requirement in the context of ENERGY STAR and ENERGY STAR Most Efficient in the future.
<b>Ceiling Fans</b>		
General	One stakeholder agrees with EPA's decision to retain the ENERGY STAR Most Efficient 2015 criteria for ceiling fans.	EPA appreciates this feedback and support.
<b>Computer Monitors</b>		
General	One stakeholder suggests that there may soon be waning support for computer monitor incentives but at the present time, there is still significant potential to save energy within this category.	EPA appreciates these comments and will continue to evaluate the market and efficiency gains in future revisions to the ENERGY STAR Most Efficient criteria.
Minimum Performance Levels	One stakeholder supports EPA's decision to retain the Most Efficient computer monitor criteria from 2015.	EPA appreciates and agrees with this feedback. Currently, the market penetration for ENERGY STAR Most Efficient computer monitors did not warrant a revision as the criteria in place captures the top performing products.
<b>Windows</b>		
Minimum Performance Levels	One stakeholder supports EPA's decision to retain the ENERGY STAR Most Efficient 2015 criteria for windows as the market share remains small and also supports the decision to consider including criteria for advanced dynamic window products in 2017.	EPA appreciates this feedback and support.