September 13, 2021
Via Electronic Mail

Ann Baily
Director, ENERGY STAR Product Labeling
U.S. Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, D.C. 20460
MostEfficient@energystar.gov

Subject: ENERGY STAR® Most Efficient Refrigerator 2022 Criteria

Dear Ms. Baily

This letter is submitted on behalf of the Northwest Energy Efficiency Alliance (NEEA) and Efficiency Vermont in response to the request for comments on the proposed 2022 ENERGY STAR Most Efficient Products efficiency levels. Efficiency Vermont is a statewide energy efficiency utility, which works to reduce the cost of energy for all Vermonters by helping families, businesses and institutions understand and make better use of energy while reducing greenhouse gases. NEEA is a non-profit organization representing an alliance of more than 140 Northwest utilities and energy efficiency organizations working on behalf of more than 13 million energy consumers. We encourage the development and adoption of criteria recognizing energy and water-efficient products that help consumers save on utility bills.

As members of the ENERGY STAR Retail Products Program, we strongly support the U.S. Environmental Protection Agency's (EPA) ENERGY STAR® program. ENERGY STAR is a critically important federal program created with bi-partisan support that annually delivers billions of dollars of energy savings to consumers and businesses. As such, ENERGY STAR's leadership in setting appropriate product specifications plays a critical role in advancing the efficiency of consumer products that meet experiential expectations and save consumers energy and money.

Efficiency Vermont and NEEA are pleased to see that EPA has updated the 2022 Most Efficient performance levels for consumer refrigerators and freezers to align with the current Emerging Technology Award for Advanced Adaptive Compressors. We support recognizing those consumer refrigerators[1] that are 30% more efficient than DOE minimum required efficiency levels and those standard-size freezers at least 15% more efficient than federal requirements. However, in transitioning from the current Emerging Technology Award, ENERGY STAR has removed the requirements for reporting low global warming potential (GWP) refrigerants and insulation. Many utilities are now considering carbon offset and low GWP as efficiency and

[1] https://www.energystar.gov/sites/default/files/EPA%20Memo%20ENERGY%20STAR%20Most%20Efficient%202022.pdf

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environmental impact metrics and tracking the adoption of these criteria is critical to achieving carbon offset and low GWP adoption goals.

At a minimum, we suggest requiring the reporting of natural refrigerants for ENERGY STAR Most Efficient refrigerators in side-by-side or bottom freezer configurations, and standard size freezers. Furthermore, we also see high value in requiring the reporting of low GWP insulation and are confident that manufacturers will respond with product enhancements to meet these requirements.

Sincerely,

Jasmine Rivest

Jasmine Rivest
Program Manager
Efficiency Vermont

Eric Olson

Eric Olson
Senior Manager
Emerging Technology and Product Management
Northwest Energy Efficiency Alliance
Chair
ENERGY STAR Retail Products Program Products Task Force

cc. Ga-Young Park