

August 18, 2022  
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 2022 Criteria**

Dear Ms. Baily

This letter is submitted on behalf of the Northwest Energy Efficiency Alliance (NEEA) in response to the request for comments on the proposed 2022 ENERGY STAR Most Efficient Products efficiency levels. 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.

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.

NEEA is pleased to see that EPA has updated the Most Efficient performance levels for many of the ENERGY STAR categories and we are pleased to provide the following feedback.

**Ceiling Fans:**

NEEA supports EPA's proposed criteria for all ceiling fans recognizing approximately top 6% of fans, offering approximately 67% savings over Department of Energy (DOE) savings.

**Central Air Conditioners and Heat Pumps and Ductless Air Conditioners and Heat Pumps:**

NEEA is pleased by the EPA's proposal to change Most Efficient performance levels to align with the Version 6.0 specification revision. We are also delighted that manufacturers are encouraged to certify to Version 6.0 early with the Appendix M1 method 2023 criteria. Additionally, NEEA supports the addition of Most Efficient Cold Climate heat pumps to increase the adoption of heat pumps in colder climates. Finally, NEEA supports the requirement for Most Efficient equipment to store the past ten (10) faults until cleared and have the capability to contact a service professional directly. NEEA's previous research<sup>1</sup> has found that

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<sup>1</sup> <https://neea.org/resources/maximizing-mini-split-performance-report>

remote fault detection and diagnostics (FDD) can increase customer satisfaction, maintain equipment performance, and increase energy savings for utilities.

**Clothes Dryers:**

NEEA supports EPA’s proposal to maintain the 2021 Most Efficient criteria for 2022 and encourages DOE to closely monitor the Department of Energy’s work on updating the test methodology and energy conservation standards.

**Clothes Washers:**

NEEA supports the EPA’s proposal to maintain the Most Efficient levels established in 2021. NEEA also recommends improvements to the current test procedure to incorporate additional cycles and load sizes to differentiate ENERGY STAR washers from non-ENERGY STAR washers. NEEA’s research has uncovered large discrepancies in energy usage when changing cycle settings from the current Department of Energy specified loads<sup>2</sup>, revealing a significant opportunity to reduce the energy consumption of clothes washers.

**Computer Monitors:**

NEEA supports EPA’s recommendation to update the Most Efficient criteria for computer monitors representing approximately 10% of ENERGY STAR models. Furthermore, we recommend ENERGY STAR investigate modifying the TV ENERGY STAR version 9 specification test procedure for computer monitors and displays to better measure their performance.

**Dehumidifiers:**

NEEA supports the EPA’s proposal to maintain the current 2021 for 2022.

**Geothermal Heat Pumps:**

NEEA supports the proposal to maintain the current criteria for geothermal heat pumps and the focus on quality installation, maintenance, and the additional requirement for diagnostic fault history and communication with a service professional.

**Furnaces:**

NEEA supports the maintenance of the current 2021 Most Efficient requirement for furnaces and the additional requirement for fault code storage and the ability to communicate with a service professional.

**Boilers:**

NEEA is pleased at the additional of boilers to the list of products with an ENERGY STAR Most Efficient performance level for 2022.

**Refrigerators-Freezers, including compact models:**

NEEA supports EPA’s proposal for Most Efficient products for 2022, building off the progress gained with the Emerging Tech Award for adaptive compressors. NEEA is encouraged by the response this new performance level is receiving from manufacturers, and we anticipate more industry participation.

**Room Air Conditioners:**

NEEA supports EPA’s proposed revision to the Most Efficient Criteria to 35% better than the Federal Standard. We have been encouraged by the adoption of these more efficient models in our territory and are pleased with manufacturer participation in the Most Efficient level of performance.

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<sup>2</sup> <https://neea.org/resources/coming-clean-revealing-real-world-efficiency-of-clothes-washers>

**Ventilating Fans:**

NEEA supports maintaining the 2021 Most Efficient criteria for ventilating fans. We are pleased to see EPA encouraging manufacturers to report noise data for their fans so that they qualify as Most Efficient.

**Windows and Sliding Glass Doors:**

NEEA supports ENERGY STAR's decision to maintain the previous year's Most Efficient level and look forward Version 7.0 Specification for Residential Windows, Doors and Skylights.

**Excluded Products:**

NEEA encourages EPA to consider Most Efficient levels for gas and electric water heaters and are pleased with the Version 4.0 specification progress. We recommend the EPA create Most Efficient performance levels for gas condensing, whole-home gas tankless, high-efficiency gas storage, and heat pump water heaters meeting Version 4.0 performance levels.

Additionally, NEEA supports highly efficient HPWHs and recommends that ENERGY STAR consider what NEEA refers to as Tier 4 HPWHs. One manufacturer currently meets NEEA's Tier 4 performance level, but additional manufacturers will be launching models in late 2021 and early 2022. This category has a general UEF of 3.5 or higher with some reaching over 4.0. There are well over 75 products listed on NEEA's [qualified products list](#) with 40- 80-gallon tank sizes.

Thank you,



Eric Olson  
Interim Senior Manager  
Emerging Technology and Product Management