



Ann Bailey
ENERGY STAR Product Labeling
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September 6, 2016

Ms. Bailey,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program to the proposed updates to the Most Efficient program criteria for 2017. After careful review of the proposal, NEEP, along with Efficiency Vermont (henceforth referred to collectively as NEEP), respectfully submit the following comments. In general, we are very happy with the direction the EPA is taking with the Most Efficient Program, but offer the following recommendations on specific products.

Elimination of Televisions

NEEP is somewhat concerned with the suspension of the Most Efficient for Televisions category. While growth in this product category has not occurred as rapidly as new specifications for Televisions have achieved in the past, the Most Efficient Program for Televisions has helped to push the envelope for highly efficient manufacturers to be recognized. In the Ultra-HD category, which is growing in interest from consumers, the Most Efficient criteria presented a high bar for efficient, Ultra-HD TVs to reach. While in 2016 no Ultra-HD TVs did earn ENERGY STAR Most Efficient recognition, the ability of the current spec to push manufacturers towards a much more efficient Ultra-HD TV is meaningful to the market.

NEEP recognizes that ENERGY STAR is looking for additional data to inform the V8 Televisions specification, but with regards to the Most Efficient category, NEEP would recommend that EPA maintain the same criteria into 2017 and consider making adjustments to the program once the V8 process has completed in 2017, not before. At present, there are not too many televisions earning the Most Efficient recognition and unless there are significant concerns that those on the list do not deserve to be so, we feel maintaining the list for another year would create more market benefits than market problems.

Heating and Cooling Products

In general, NEEP is supportive of the efforts Most Efficient has taken to cover highly efficient heating and cooling technologies. As mentioned in our letter addressing the 2016 Most Efficient Proposal, the Northeast has found a challenge in Air Source Heat Pump technologies that will continue to perform at low temperatures as a heating source and has developed [our own specification](#) for products to self-report their performance at 5F. In general, ENERGY STAR's criteria around ASHP pushes their cooling efficiency, but when many units are being installed in colder climates primarily for their efficient heating capabilities, performance at low temperatures is important. As such, we would like to have a continued and open dialogue around how to best classify equipment that can both heat and cool but may be



primarily installed for one purpose or the other. If, for example, a home owner in Maine is installing an ASHP to be a new heating source, the cooling performance may not be as important as they may only use the unit to cool for a few days a year. Alternatively, the heating performance may be very important, especially during very cold weather. The same unit that might work extremely well for heating at low temperatures may not be able to cool at quite the same level of efficiency. This issue may need to be addressed in upcoming ENERGY STAR specifications, but we wanted to take this opportunity to flag this matter. NEEP wants to continue to leverage the ENERGY STAR and Most Efficient brand and process; perhaps some sort of trade-off for high efficiency equipment that is designed for cold-climates to still be eligible for ENERGY STAR or Most Efficient recognition, even if the cooling performance is slightly diminished from the criteria as it stands could be possible as this product category evolves.

Ceiling Fans, Computer Monitors, Clothes Washers, Dishwashers, Refrigerators-Freezers, Ventilating Fans, and Windows

NEEP supports the proposed maintenance of criteria and slight revisions to these product categories. Their market penetration is sufficiently small but growing to suggest largely keeping with 2016 criteria levels, but the slight revisions appear to improve the specification.

Expansion of Most Efficient Program to Include Dryers

Finally, NEEP is very excited that EPA has decided to expand the Most Efficient label to cover clothes dryers. This was a recommendation we made in our letter for 2016 criteria, and we are very excited that this opportunity for further product differentiation exists as this is a growing measure of interest in the Northeast and Mid-Atlantic.

Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP, and Efficiency Vermont to provide comments on the 2017 ENERGY STAR Most Efficient criteria. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

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