



Ann Bailey  
ENERGY STAR Product Labeling  
1200 Pennsylvania Avenue  
NW MC 6202J  
Washington, DC 20460

September 8, 2015

Ms. Bailey,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program to the proposed 2015 updates to the Most Efficiency program criteria. After careful review of the specifications and participation in the EPA led webinar in-person discussion on August 25<sup>th</sup>, NEEP, along with, PSEG Long Island and 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 this criteria, but offer the following recommendations on specific products.

#### **Central AC and ASHP**

NEEP currently manages the *Cold Climate Air-Source Heat Pump (ccASHP) Specification* and the list of units that meet the specification's requirements on behalf of energy efficiency stakeholders across the Northeast and Mid-Atlantic. The [NEEP ccASHP requirements](#) include both specific performance levels and a series of reporting requirements, with slight differences between single-zone and multi-zone. We believe that HSPF does not fully characterize a heat pump's performance at low temperatures and have incorporated a COP requirement at 5F as part of the ccASHP specification. Once a more industry-recognized test procedure is developed to measure performance at low temperatures, we will likely recommend that ENERGY STAR Most Efficient adopt this low temperature performance requirement.

Ultimately, our specification aims for regional consistency and uniformity across program requirements for efficient cold climate heat pumps. As is demonstrated in this [incentive chart](#), there is currently a wide range of program offerings and requirements. We see great opportunity for programs to move most of their performance requirements in line with ENERGY STAR's Most Efficient. This might give stakeholders the opportunity to more effectively leverage ENERGY STAR's brand recognition and power to lower energy, cost, and carbon for their customers.

#### **Computer Monitors**

NEEP is supportive of EPA's proposal to maintain strong criteria from the Most Efficient's 2015 specification. As the market for computers shifts and new mobile products enter the market, efficiency programs may or may not support incentives on computer monitors. That being said, there is still a significant savings in the market for monitors and allowing businesses or consumers the option to select the most efficient product is very important. Furthermore, this is a product for which the California Energy Commission is in the process of setting state standards. More products qualifying to the Most Efficient levels could mean a stronger CA standard for efficiency, which may ultimately impact the rest of the nation.



## **Televisions**

NEEP is fully supportive of the increase in stringency for televisions; of all electronic products, televisions have demonstrated the ability to evolve and meet whatever efficiency criteria ENERGY STAR offers. As such, by setting a more stringent Most Efficient level, we expect that will help drive the market towards that highly efficient level. Additionally, TopTen is no longer operating as a differentiation tool complementary to Most Efficient to help consumers identify the top 10 most efficient products in a category. As such, NEEP fully supports EPA's work to label stand-out televisions. Finally, NEEP is again very supportive that EPA has chosen not to include an adder for UltraHD products. In the past 6-12 months, we have seen UltraHD products follow in the footsteps of televisions before them and come down significantly in energy use. The more products that are released, the more efficient the UHD product category becomes. If and when UltraHD products start to qualify to Most Efficient, efficiency programs may take notice and potentially provide product incentives.

## **Clothes Washers, Dishwashers, and Refrigerator-Freezers Comments**

NEEP supports EPA's decisions to not make significant changes to the clothes washer, dishwasher, or refrigerator-freezer criteria. Furthermore, the expansion of clothes washers to align criteria for top- and side-loading machines is strongly supported.

## **Considerations for Expansion of Most Efficient to cover Dryers**

In addition to the current list, NEEP would strongly recommend EPA to consider expanding the Most Efficient label to cover clothes dryers that are currently being differentiated from baseline ENERGY STAR through the 2014 ENERGY STAR Emerging Technologies award. The dryers market naturally has three tiers, inefficient, efficient (now recognized by ENERGY STAR), and more efficient (recognized by the Emerging Technologies Award), but since the Emerging Technologies award is not an ongoing program set up to continue qualifying new products, efficiency programs have been faced with challenges when wanting to offer more significant rebates to the most efficiency dryers on the market. Since the Emerging Technologies award already exists and has recognized winners, we feel it would be a relatively easy transition for Most Efficient to adopt the Emerging Technology award criteria and allow differentiation in the Dryers category. Because highly efficient Heat Pump dryer technology has been available in Europe for many years, but is just now being introduced to the US market, we feel the time is perfect for Most Efficient to recognize products that incorporate heat pump technology or otherwise are able to reach much higher efficiency levels. We understand that dryers are a new product category for the ENERGY STAR brand, but still ask EPA to strongly consider expanding the ENERGY STAR Most Efficient label and ensuring that innovation is encouraged amongst manufacturers.

Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP, PSEG Long Island and Efficiency Vermont to provide comments on the 2016 ENERGY STAR Most Efficient criteria. Please don't hesitate to contact me with any follow up questions or clarifications.



Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a long horizontal flourish extending to the right.

Claire Miziolek  
Market Strategies Program Manager  
Northeast Energy Efficiency Partnerships (NEEP)  
[cmiziolek@neep.org](mailto:cmiziolek@neep.org)  
781-860-9177 x115