



NRDC Comments on EPA's ENERGY STAR Most Efficient 2016 Proposed Criteria

September 8, 2015

On behalf of the Natural Resources Defense Council (NRDC) and its more than 2 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's proposed criteria for the Most Efficient 2016 label. NRDC has been a longtime supporter of the ENERGY STAR program and continues to strongly support the addition of the Most Efficient designation to the program. Most Efficient fills a much needed gap by allowing consumers to identify top performing products.

We offer the following general comments on the Most Efficient program and the proposed Most Efficient criteria for 2016.

General Comments on the Most Efficient Program

NRDC strongly supports the continuation of the Most Efficient program. The ENERGY STAR Most Efficient program fills an important role in identifying the best of the best products. The Most Efficient designation provides valuable information to early adopters of highly efficient products, who may be motivated by their environmental benefits. These early adopters play an important role in shifting markets towards greater efficiency and the Most Efficient label is an important tool to influence their purchasing decisions. It is particularly encouraging to see the significant growth in the number of products recognized as Energy STAR Most Efficient, in nearly all product categories. We are also pleased to see the large upswing in the number of utility efficiency program sponsors leveraging the Most Efficient designation. We also support and appreciate EPA's dedicated marketing efforts to raise demand of Energy STAR Most Efficient among target customers. We continue to strongly support the Most Efficient program and are encouraged by the progress it has made since the program's inception.

NRDC supports the annual updating of the Most Efficient criteria as appropriate. NRDC is pleased to see EPA's ongoing commitment to review the Most Efficient criteria annually. Having up to date specifications that continue to reflect the top performers is important to develop and maintain the strength of the Most Efficient brand. EPA should continue to update the levels each year as appropriate to keep the specifications fresh. EPA should also consider whether to add new products to the Most Efficient program as appropriate. In particular, we recommend that

EPA consider expanding the Most Efficient program to include commercial products for the 2017 specification.

Comments on Proposed Specifications

NRDC generally supports the proposed criteria for the 2016 Most Efficient specifications with the following specific comments.

Clothes Washers

NRDC supports having the same set of criteria apply to both front- and top-loading clothes washers, a rationale consistent with the Energy STAR Most Efficient intent to recognize the best of the best, irrespective of configuration. In setting common specifications for both, we also support EPA's approach of adopting the more stringent criteria for the Integrated Water Factor and Integrated Modified Energy Factor. We agree with excluding small volume products at this time due to lack of data and efficiency differentiation for these products in the market.

Dishwashers

NRDC supports maintaining the Most Efficient criteria for dishwashers at the 2015 levels for 2016, given the limited number of products on the market today that currently meet all three criteria – water, energy, and cleaning performance. We are pleased to see that EPA added a cleaning performance requirement in both the light and medium cycles, removing the incentive for consumers to switch to the more energy and water intensive heavy cycle option by ensuring that they achieve cleaning, energy, and water performance simultaneously in *all* cycles. We continue to recommend that EPA require manufacturers to report the cycle time in all three modes – heavy, medium and light – and that EPA collect this data. Cycle time is a key component of consumer utility and it would be valuable to have this information available when EPA considers future updates to the Most Efficient specification.

Refrigerators

NRDC supports maintaining the Most Efficient Criteria for refrigerators at the 2015 levels for 2016, given both the compelling energy savings achieved by the Most Efficient products (over 15% savings compared to products just meeting the 2014 federal minimum) and the appropriate number of products on the market meeting the 2015 Most Efficient criteria. While at least four manufacturers (Samsung, Fisher & Paykel, Liebherr and Bosch) currently offer models that meet the proposed levels, which demonstrates these levels are indeed achievable in current products, these brands have limited market share in the US.

We also strongly support EPA closely monitoring the market following the updated refrigerator criteria which took effect in September 2014 and encourage EPA to make the necessary changes to the ENERGY STAR specifications and to ENERGY STAR Most Efficient product criteria for

2017 as the market adjusts to the updated criteria and new, more efficient models are introduced to the market.

Ceiling Fans

NRDC supports maintaining the Most Efficient Criteria for ceiling fans at 2015 levels for 2016, as it continues to recognize an exclusive group of top performers offering considerable power savings compared to conventional fans. We also strongly support that – after DOE finalizes the first minimum efficiency standards for ceiling fans – EPA continue to monitor the market to possibly update the recognition criteria for 2017 and raise the bar to keep rewarding the best of the best.

Ventilating Fans

NRDC supports the proposed update to the criteria for ventilating fans with the addition of an efficacy requirement at high speed. This is important because fans use more energy at high speeds and can vary in efficiency as speed increases.

Ductless and Centrally Ducted Air Conditioners and Heat Pumps

NRDC supports the addition of the system status and messaging criteria for ductless split air conditioners and heat pumps. By raising the stringency of the criteria, this update ensures the exclusivity of the Most Efficient brand. We also support that EPA consider future opportunities to revise the criteria for geothermal heat pumps, as products in this category are increasingly recognized as Most Efficient.

In line with our comments from previous years, we continue to recommend that EPA consolidate the recognition criteria for centrally ducted and ductless systems. These products should not be held to different standards, as they do not offer an inherently different utility to consumers.

Boilers

NRDC supports EPA's rationale behind maintaining the Most Efficient criteria for boilers at 2015 levels for 2016. We also strongly support that EPA keep considering opportunities to raise the stringency of the criteria in the future and ensure that it captures the very best of products on the market.

Televisions

NRDC supports EPA's proposed levels for Most Efficient 2016 for televisions. This continues to be a fast moving category, as evidenced by products on the market rapidly improving their energy efficiency. We thus support revising the criteria to maintain the exclusivity of the Most Efficient brand and ensure that it captures the very best performers. We also support having a single specification as proposed and would not support including any additional power allowance for TVs with additional features, such as ultra-high definition.

In line with our previous comments to the Most Efficient criteria for televisions, we continue to urge EPA to closely monitor manufacturers' implementation of new features such as internet connected TVs to ensure they do not result in high levels of standby power that may not be accounted for in current test methods. EPA should address these new sources of energy use in their 2017 Most Efficient update and future revisions to the ENERGY STAR specification.

Computer Monitors

NRDC supports maintaining the Most Efficient criteria at 2015 levels for 2016. Given that it's a slow moving product category, maintaining the same levels of criteria would still reflect the top performers as the qualification rate is expected to remain low.

Windows

NRDC supports maintaining the Most Efficient Criteria at 2015 levels for 2016, given that the number of products on the market meeting the criteria remains small. We strongly support that EPA keep considering including specifications for advanced dynamic window products for its Most Efficient 2017 proposed criteria. These windows can be switched from high to low solar heat gain coefficient (SHGC) to regulate the solar energy entering a building, reducing building cooling energy needs.

Thank you for the opportunity to submit these comments.

Sincerely,



Meg Waltner
Manager, Building Energy Policy
Natural Resources Defense Council



Rachel Fakhry
MAP Sustainable Energy Fellow
Natural Resources Defense Council