



NRDC Comments on ENERGY STAR Version 7.0, Final Draft Specification for Televisions

December 17, 2014

On behalf of the Natural Resources Defense Council (NRDC), we respectfully submit our comments on the ENERGY STAR Version 7.0 Final Draft Specification for Televisions (Final Draft) issued on December 3, 2014. In summary, we are very supportive of EPA's Final Draft, with two minor exceptions where we provide recommendations to address these concerns below, and urge EPA to finalize its specification by the end of the year and to maintain its proposed effective date of September 30, 2015. In particular we support EPA's proposals in the Final Draft for: a) on mode power levels, b) standby active low mode power levels, c) luminance requirements, and d) allowing manufacturers to certify complying products immediately after the specification has been finalized (expected December 31, 2014).

NRDC recommends EPA develop a process to track and report the compliance rate of UHD TVs that meet ENERGY STAR's on mode power limit, and to include a mechanism to adjust the current 50% power adder downwards if high qualification rates of UHD TVs are observed within the first 9 months of the Version 7 effective date.

NRDC is disappointed that the Final Draft does not include any time limitation or other mechanism to adjust the very generous 50% power adder provided for ultra-high definition (UHD) televisions during ENERGY STAR 7.¹ At a minimum we recommend EPA develop a specific and transparent mechanism to track and publicly report the market share of UHD models that meet ENERGY STAR 7 on mode power requirements. EPA should work closely with its stakeholders that track and analyze ENERGY STAR TV sales in more real-time than the annual Unit Shipment Data process it currently utilizes. In addition, we would like EPA to commit to updating its specification if market share of 50% is observed in 2015 or early 2016 (e.g. soon after the specification is in effect), and for an updated version of the specification to go into effect within 6 months of such an occurrence. This approach provides EPA with the ability to modify its specification if necessary rather than waiting till Version 8 is in effect, most likely sometime in late 2017 or early 2018.

¹ EPA's Draft 2 included an expiration date of the ultra-high definition power adder of May 1, 2017. The Final Draft does not include an expiration date or mechanism for updating the UHD power adder during Version 7 of the specification and instead plans to address this issue in Version 8 of the specification which might be 3 or more years from today.

As we stated in previous comments, we fully expect the 2015 UHD models to consume considerably less power than the initial UHD models that were launched in 2014. In addition we expect UHD sales to grow exponentially as their price points continue to exhibit dramatic reductions.

While we appreciate and support EPA's efforts to update their specifications frequently for fast moving product classes like TVs, we believe a different outcome would have resulted if on mode power data for 2015 UHD TVs could have been part of the analysis. Should market share of efficient UHD TVs grow as anticipated, it would be unfortunate if significant quantities of less efficient UHD TVs are able to continue to be sold bearing the ENERGY STAR label. This would negatively impact the leadership value and integrity of the ENERGY STAR label and brand.

We believe the proposal we outlined above: a) allows EPA to finalize its specification this year, without further delay, b) provides market data on the rates and power use of UHD models meeting ENERGY STAR Version 7.0 on mode power levels, and c) contains a specific mechanism and commitment for EPA to update its requirements for UHD TVs on timely basis, if market developments warrant it, and to preserve its brand equity. An up to date and sufficiently stringent set of requirements will ensure manufacturers of the more efficient UHD TVs are rewarded, and consumers have a simple and effective tool for identifying the more efficient UHD TVs when shopping for a new TV.

NRDC recommends addition of a reporting requirement for TVs that include a Quick Start type feature. (This recommendation has negligible reporting burden and represents a decrease and compromise from our previous proposal which also requested reporting of the power use and restart time.)

In our prior comments, NRDC and other efficiency advocates expressed our concern about TVs that include an optional Quick Start or equivalent feature which is sometimes included in Smart TVs (TVs that provide a direct connection to the internet and functionality such as video streaming of content like You Tube or Netflix without the need for additional devices.) For some TVs, the default or initial set up results in slow reboot/resume times. As a result, many consumers will subsequently seek out options such as Quick Start, which are contained in the feature menus that provide much faster reboot and connection times. Unfortunately some implementations of Quick Start use as much as 24 Watts of power for up to 19 hours per day. At these levels, annual energy use for a TV model could more than double for some TVs.

While the current test method and ENERGY STAR specification requirements will capture the incremental power from Quick Start if this option is presented during initial TV set up, the DOE test method DOES NOT capture it if this option is only available after its first use. In such cases a TV marketed as ENERGY STAR compliant may in reality use a lot more energy than non-qualified models.

Rather than adopt our initial proposal to require reporting of this feature and for manufacturers to report both the power use and reboot time, EPA has proposed not to

add any additional requirements regarding Quick Start that is not part of the TV's initial set up. We understand that EPA's decision was guided in part by their desire to minimize manufacturer reporting and testing burden. We too are sympathetic to this concern and as a compromise strongly recommend EPA simply add a mandatory Y/N field to its reporting template for manufacturers to identify whether or not their model includes a post set up Quick Start option. This is a very simple declaration to make.

This information will prove very useful to EPA and other stakeholders during the Version 8 specification development process. By knowing which models have this feature, EPA can perform some testing of representative models to better understand the power use of this feature and its prevalence.

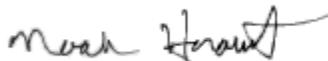
It should also be noted that several manufacturers already demonstrated in their comments a willingness to provide additional information on features in their models as their comments recommended reporting when a model has voice or gesture recognition or the capability to incorporate a thin client.

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In summary, we believe EPA has developed an excellent Final Draft proposal and we encourage EPA to consider and incorporate the two minor changes we proposed which will yield an even more effective Version 7 specification and provide useful data for the development of Version 8. These changes are very simple to incorporate and allow EPA to meet its desired completion date of December 31, 2014.

We commend EPA for its open and thorough specification setting process and are available to discuss this with your staff at any time.

Respectfully Submitted By:



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