



Ann Bailey, Director
ENERGY STAR Product Labeling
US Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

September 5, 2018

Ms. Bailey,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program on the proposed updates to the 2019 Most Efficient Program. In general, NEEP is incredibly supportive of the Most Efficient Program and the important role it plays in advancing the efficiency of consumer products. After review of the proposal, NEEP respectfully submits the following comments.

Overarching Comment: Connectivity in Most Efficient

One broad comment that NEEP wanted to share is the role that connected criteria plays in the Most Efficient program. Historically, products that earn Most Efficient designation have not also been asked to be connected, though there is optional connected criteria included in many ENERGY STAR specifications. Moving forward, for many of the larger consumer end use products, such as HVAC, laundry, and refrigeration, while the products themselves may, in some cases and for those achieving Most Efficient designation, be nearing max tech for their efficiency performance, there is still significant potential benefit from better control on the timing of use for these products. By encouraging more products to be connected, EPA could be helping better manage peak energy use on the most constrained days when a potentially dirtier, less efficient back-up generation supply may be needed for a grid to meet demand. While pollutants and carbon emissions are challenging to trace back to an individual product's energy use, we know that there are more peak days coming when energy can be at a premium; connected products offer the opportunity to help curtail some of the energy use at the most critical times.

To this end, we would ask EPA to consider making the products that meet the Most Efficient criteria and are also connected more prominent in the 2019 Most Efficient program, with the objective of potentially incorporating connectivity directly into the criteria for Most Efficient products in future years. While many consumer electronics manufacturers are voluntarily adding connectivity to their suite of offerings for consumer interest, appliance and HVAC manufacturers has been much slower to embrace this trend. For those products with a potentially long shelf-life, including connectivity today gives the opportunity for control into the future.



Dehumidifiers

NEEP strongly supports the recommended changes to the dehumidifier category, particularly in an attempt to harmonize metrics between specifications and test procedure changes. NEEP supports EPA's suggestion to increase stringency of the criteria into 2020.

Dryers

NEEP supports EPA's suggested updates to the dryer criteria. Heat pump technology is being supported throughout the Northeast and a better ability to identify those products will be beneficial. When publishing the criteria, NEEP recommends EPA encourage stakeholders to report heat pump status in 2019 and state the intention to require reporting of that status in 2020.

Ducted/Ductless CAC and Heat Pumps

NEEP is fully supportive of the proposal to require variable capacity for 2019. NEEP maintains a product list of Air Source Heat Pumps that perform well in cold conditions, and in our proposed specification revision¹, we include the following comments regarding variable capacity:

NEEP intends on continuing to require variable capacity as an element of meeting the ccASHP Specification. The genesis of this requirement stems from the inherent advantage of operating in part load compared to the higher cycling behavior of single and two speed system. While efficiencies are achieved through this part load operation, the current metric/test procedure (HSPF/AHRI 210/240) does not fully capture these benefits. NEEP is monitoring the development of a new voluntary test procedure being developed by CSA [Canadian Standards Association] Group that we believe has potential to more fully capture these benefits. We encourage manufacturers who have single- or two-speed systems that believe their systems are high performing cold-climate systems to explore opportunities to have these systems tested using the voluntary test procedure (expected to be finalized in 2018). NEEP will be assessing on an ongoing basis if and when it might be appropriate to incorporate the CSA test procedure into the ccASHP Specification.

Finally, while I respect EPA's decision to host a webinar on the 2019 Most Efficient proposal after the comments are due, I am not sure that I understand it. I believe the traditional routine of a public

¹ https://neep.org/sites/default/files/Cold%20Climate%20Air%20Source%20Heat%20Pump%20Specification-%20Proposed%20Revisions%20Memo_0.pdf



COMMENTS ON ENERGY STAR 2019 MOST EFFICIENT | PAGE 3 of 3

webinar in advance of stakeholder written feedback is a successful way to elicit comprehensive written comments.

Thank you for offering the opportunity for NEEP to provide comment to the 2019 Most Efficient program. ENERGY STAR is and must continue to serve in a leading role in recognition of high performing products, and NEEP looks forward to continuing to support ENERGY STAR's efforts into the future. 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 horizontal line extending from the end of the signature.

Claire Miziolek
Technology and Market Solutions Senior Manager
Northeast Energy Efficiency Partnerships (NEEP)
cmiziolek@neep.org
781-860-9177 x115