

# ENERGY STAR® Most Efficient 2018 Stakeholder Comments

Topic	Comment Summary	EPA Responses
<b>General</b>		
ENERGY STAR Most Efficient Program	Three stakeholders expressed support for the ENERGY STAR Most Efficient program and highlighted the importance of recognizing efficient products on the market.	EPA appreciates the comments.
ENERGY STAR Most Efficient Program	One stakeholder expressed the vital role ENERGY STAR Most Efficient plays in saving billions of dollars of energy savings to consumers and business each year.	EPA appreciates the comments.
ENERGY STAR Most Efficient Program	One stakeholder is concerned that EPA continues to establish ENERGY STAR Most Efficient criteria in a manner inconsistent with EPA's Guiding Principles for the ENERGY STAR program. Additionally, they believe EPA did not provide enough analysis to indicate how or why it has chosen the eligibility criteria in the proposal.	ENERGY STAR Most Efficient is designed to identify and advance highly efficient products in the marketplace. ENERGY STAR Most Efficient complements the base ENERGY STAR program, identifying for a set of early adopter consumers and energy efficiency program sponsors, the most energy efficient of the ENERGY STAR certified products. Designed for this audience, EPA sets criteria with efficiency prioritized above all else and understands from a range of stakeholders that this objective is being met.
ENERGY STAR Most Efficient Program for Appliances	One stakeholder recommended EPA include the 5% credit for ENERGY STAR Most Efficient connected products similar to the ENERGY STAR certification. They believe this will help drive the importance of connected criteria and improve overall energy efficiency.	EPA shares the commenter's interest in raising the profile of ENERGY STAR products that meet the connected criteria. However, the Agency believes doing so does not require provision of a 5% credit for the most efficient and most innovative products recognized as ENERGY STAR Most Efficient.
<b>Boilers</b>		
Criteria	One stakeholder supports EPA's proposal to maintain the ENERGY STAR Most Efficient criteria for boilers and encourages EPA to continue to review opportunities to be more stringent.	EPA appreciates the comment and will continue to evaluate opportunities for updating the recognition criteria in the future.

### Ceiling Fans

Criteria	Multiple stakeholders agree with the revisions made to the ENERGY STAR Most Efficient 2018 ceiling fans criteria.	EPA appreciates the comments.
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### Clothes Dryers

Criteria	Five commenters support EPA's proposal to maintain the ENERGY STAR Most Efficient criteria for clothes dryers. One suggests the program consider updating the requirements in 2019.	EPA appreciates the comments and plans to maintain the criteria for dryers, now labeled as Electric (All Other). As Most Efficient is an annual designation, EPA intends to review the criteria next year.
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Criteria	One stakeholder requested EPA consider developing separate qualification criteria for all clothes dryer product classes because it would allow for recognition of the unique characteristics of electric dryers, allow current heat pump dryers on the market to qualify for ENERGY STAR Most Efficient, and would help align the program with DOE.	EPA is finalizing separate criteria for compact ventless electric 240V dryers, which will enable additional models to be eligible for Most Efficient recognition. EPA is not adding separate criteria for any other electric dryer product classes. To earn ENERGY STAR Most Efficient recognition, the other classes are expected to meet the criteria labeled as Electric (All Other).
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Criteria	Given the small market penetration of ENERGY STAR Most Efficient clothes dryers, three commenters encourage EPA to set different energy levels for compact units to increase the number of products recognized for 2018.	EPA is finalizing separate criteria for compact ventless 240V dryers, which will enable additional models to be eligible for ENERGY STAR Most Efficient recognition.
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### Computer Monitors

Criteria	Two stakeholders agree with the proposed revisions to the ENERGY STAR Most Efficient computer monitors criteria and one mentioned they liked that the recognition captures larger products.	EPA appreciates these stakeholder comments and plans to move forward with the proposed criteria.
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### Clothes Washers

Criteria	Five stakeholders support the new recognition criteria and four highlight the importance of including small volume clothes washers.	EPA appreciates the comments and is finalizing criteria to enable recognition of small volume washers.
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Criteria	One stakeholder highlighted that the revised criteria will help the alignment with CEE Tier 2 criteria and reduce confusion for those leading efficiency incentive programs.	EPA seeks alignment with corresponding CEE criteria whenever possible.
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Criteria	Two stakeholders suggested the maximum IWF criteria for small volume washers should be 3.6 rather than the proposed level of 3.8. Based on market share data using regional sales, one of the commenters noted that market share would not be significantly impacted by lowering the bar.	Upon consideration of the comments recommending revised IWF criteria for small volume washers, EPA has determined that product availability would not be affected by setting the level at 3.7, rather than the initially proposed level of 3.8, and has finalized the criteria at 3.7. This will enable even greater consumer savings. Further, the commenter's data shows the same regional sales-based market share at that level.
Criteria	One stakeholder recommended EPA combine the categories for front-load and top-load washers in future specifications because right now top-loading models qualify for ENERGY STAR even though they are less efficient than some non-qualified front-loading models.	For purposes of Most Efficient, EPA has maintained one set of criteria regardless of configuration in order to recognize the top performers. ENERGY STAR V 8.0 criteria, which take effect in February 2018, are separate for front and top-load washers. EPA will review the ENERGY STAR criteria again during the next specification development cycle.
Testing Requirements	One stakeholder recommended including a cleaning test in future requirements to ensure the clothes-cleaning capability is maintained.	Ensuring that product performance is not compromised even as efficiency improves is a key tenet of ENERGY STAR. EPA continues to monitor the relationship between energy and water use and cleaning performance.
<b>Dehumidifiers</b>		
Criteria	Three stakeholders supported the new product category, and two specifically agree with the criteria for smaller units, less than 75 pints/day capacity, and an energy factor of 2.3 or higher. One utility plans to implement ENERGY STAR Most Efficient dehumidifier rebates in 2018.	EPA appreciates the support in proposing this new product category.

Criteria	One stakeholder encouraged EPA to consider including portable dehumidifiers under the ENERGY STAR Most Efficient dehumidifiers criteria because as of now, only whole-home products meet the recognition. They suggest including a lower EF level to capture the portable models.	EPA appreciates the comment and intends to recognize portable dehumidifiers as ENERGY STAR Most Efficient. As such, EPA has decided that an EF of 2.2 for portable dehumidifiers with capacities less than 75 pints/day is appropriate for ENERGY STAR Most Efficient 2018. A limited quantity of portable dehumidifiers on the market rated at this level, but test data show that many more can attain it. The criteria of 2.3 EF is maintained for whole-home dehumidifiers.
Criteria	One stakeholder did not understand why EPA has chosen dehumidifiers as a new ENERGY STAR Most Efficient product category.	EPA intends to recognize highly efficient dehumidifiers which are now appearing in the market. Specifically, EPA will recognize dehumidifiers with capacities less than 75 pints/day. Products in this capacity range are typical in residential installations, with the most common type being portable dehumidifiers. Highly efficient products with capacities greater than or equal to 75 pints/day are offered by a very limited number of manufacturers and are typically installed as whole-home units or as humidity control devices for basements, and not sold at retail.
<b>Dishwashers</b>		
Criteria	Two stakeholders agreed with maintaining the 2017 ENERGY STAR Most Efficient criteria into 2018. One indicated support for the inclusion of the cleaning test.	EPA appreciates the comments and is maintaining the criteria including the required cleaning test.
<b>Furnaces</b>		
Criteria	One stakeholder agreed with the revisions made to the ENERGY STAR Most Efficient 2018 furnaces criteria.	EPA appreciates the comment.
<b>Refrigerators/Freezers</b>		

Criteria	Three stakeholders support EPA's proposal to maintain current criteria for this category. Two note that market share based on their sales data is within the target range for Most Efficient.	EPA appreciates the comments, and the insights shared on regional sales data.
Criteria	One stakeholder recommends that the ENERGY STAR Most Efficient top mount criteria be revised. The current recognition accounts for a quarter of the market and the stakeholder believes this does not represent the "best of the best".	EPA has reviewed the top mount criteria and concluded that sufficient differentiation and product availability to revise does not exist at this time. However, EPA looks forward to continued efficiency advances in this product type and hopes to be able to recognize higher efficiency top mounts in the future.

**Televisions**

Criteria	One stakeholder proposes EPA lower the UHD allowance from 50% to 12%, or 20% in the ENERGY STAR Most Efficient criteria and requests EPA to clarify the MDD requirements in the Version 8 specification to make them more quantitative and enforceable	EPA will consider this suggestion to lower the UHD allowance when developing a proposal for Most Efficient after the Version 8.0 specification is finalized. EPA will analyze the pass rate for products with UHD to determine the appropriate allowance.
Criteria	One stakeholder recommended EPA incorporate the following edits to the ENERGY STAR Most Efficient television criteria: <ul style="list-style-type: none"> <li>• Require a minimum brightness of 125 lumens at 3 lux</li> <li>• Remove the requirement for maximum number of Preset Picture Settings without ABC</li> <li>• Do not require a mandatory notification for disabling ABC</li> <li>• Lower the UHD adder to 20%, down from the current level of a 50% allowance</li> </ul>	EPA is still engaging with stakeholders on the ENERGY STAR Version 8.0 television specification. Once this specification development process is completed, EPA will evaluate if establishing ENERGY STAR Most Efficient criteria for televisions is viable for 2018. EPA will consider these comments should the Agency move forward.

**Water Heaters**

Criteria	One stakeholder is interested in the rationale behind omitting traditional residential water heaters from the ENERGY STAR Most Efficient criteria.	ENERGY STAR water heaters continue to offer distinguished performance compared to conventional water heaters. A limited percentage of the market can meet and is certified as ENERGY STAR. As such, EPA does not feel that the timing is right to propose even more strict ENERGY STAR Most Efficient criteria.
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### Vent Fans

Criteria	One stakeholder agrees with the revisions made to the ENERGY STAR Most Efficient 2018 vent fans criteria.	EPA appreciates the comment and will continue to evaluate opportunities for updating the recognition criteria in the future.
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### Windows

Criteria	One stakeholder support EPA's proposal to maintain the ENERGY STAR Most Efficient criteria for windows, but encourages EPA to consider including advanced dynamic window products in 2019.	EPA continues to track progress in dynamic windows closely and watch for opportunities to recognize this advancement.
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