ENERGY STAR® Most Efficient 2023 Stakeholder Comments & Responses

Topic	Comment Summary	EPA Responses
General		
General	Several stakeholders agree the ENERGY STAR Most Efficient program plays a valuable role in supporting efforts to promote high efficiency to early adopters if the recognition of the ENERGY STAR brand can be linked to financial incentives, education, and marketing offered by local programs. One stakeholder encourages EPA to consider requiring the reporting of refrigerants for all relevant Most Efficient products. One stakeholder encourages EPA to use the ENERGY STAR Most Efficient program to recognize the leading products in their perspective categories and not bias the program toward specific product types.	EPA thanks stakeholders for these comments. EPA agrees with the importance of refrigerant reporting and has enabled refrigerant reporting across all relevant ENERGY STAR and ENERGY STAR Most Efficient categories, has added filtering by low GWP refrigerants, and included refrigerant educational information for consumers. The ENERGY STAR Most Efficient program by design highlights products for those who prioritize environment over other considerations. As such, the ENERGY STAR Most Efficient categories serve this audience accordingly.
Suggested New Product Category	One stakeholder encourages EPA to consider including gas storage water heaters, gas heat pumps, and super-efficient room air conditioners to Most Efficient.	EPA does not believe that adding gas storage water heaters serves the needs of the ENERGY STAR Most Efficient as more environmentally preferable options exist. EPA is following developing practices for testing gas air-source heat pumps and will examine their fit with ENERGY STAR Most Efficient in the future. Similarly with super-efficient room conditioners, EPA anticipates including them in ENERGY STAR, and ENERGY STAR Most Efficient in the future.
Air Source Heat Pumps and Central AC		
Criteria and Scope	Seven stakeholders encourage EPA to no longer recognize Central Air Conditioners in the Most Efficient Program. As CACs only provide cooling, they are likely paired with a fossil-fuel-fired furnace that delivers 100 percent of a home's heating needs. Currently, 62% of ESME 2022 models are CACs. Switching all central ACs to heat pumps were 49 Mt CO2 over 10 years, along with $27 billion in heating bill savings, and an additional $80 billion in societal benefits.	EPA agrees that hybrid heating is the logical next step for retrofits in existing homes, given the modest incremental cost to install a heat pump instead of an AC, and is adjusting our marketing and communication strategy accordingly. EPA expects 2023 to be the last year we recognize central air conditioners as ENERGY STAR Most Efficient.

General	Two stakeholders expressed support for EPA's proposal and for the decision to auto nominate products certified to ENERGY STAR Version 6.1.	EPA thanks stakeholders for these comments.
Ceiling Fans		
General	One stakeholder expressed support for EPA's proposal.	EPA thanks stakeholders for these comments.
Clothes Dryers		
Test Procedure	One stakeholder expressed support for EPA's proposal. The stakeholder also expressed interest in improving the test procedure to further differentiate ENERGY STAR through testing of additional cycles and load sizes.	EPA thanks the stakeholder for their comments. EPA plans to review the ENERGY STAR clothes dryer specification soon and will begin the revision process with a discussion guide. EPA would appreciate any further detail and information that can be shared with EPA as a part of that revision process.
Clothes Washers		
Test Procedure	One stakeholder expressed support for EPA's proposal. The stakeholder also expressed interest in improving the test procedure to further differentiate ENERGY STAR through testing of additional cycles and load sizes.	EPA thanks the stakeholder for their comments. EPA would appreciate the stakeholder sharing detailed feedback on this topic as part of the ENERGY STAR clothes washer specification revision process in the future.
Computer Monitors		
Criteria	One stakeholder expressed support for EPA's proposal. The stakeholder also encourages ENERGY STAR to investigate energy savings opportunities by using ANSI/CTA-2037D, "Determination of Television Set Power Consumption," as a basis for updating the test standard and efficiency levels for computer monitors and commercial displays.	EPA thanks stakeholder for these comments. EPA will evaluate if the application of CTA-2037 D test method for TVs is appropriate for monitors in part or completely in a future ENERGY STAR revision.
Consumer Refrigeration Products		

Criteria	Two stakeholders expressed general support for EPA's proposal. One stakeholder encourages ENERGY STAR to reevaluate the performance standards established for side freezer and bottom freezer models. They expressed that the eight base models referenced by EPA do not include more than 60 base models from major manufacturers which are 25% to 58.4% more efficient than the DOE-required efficiency levels. One stakeholder encourages EPA to adopt separate criteria for chest freezers of at least 10% more efficient than the federal standard. All 10 standard size chest freezer models in the ENERGY STAR QPL are at least 10% more efficient than the federal standard while using roughly 30 - 40% less energy than upright freezer models of the same volume.	EPA thanks stakeholders for these comments. In the near future, EPA will kick off a review of the ENERGY STAR specification for consumer refrigeration, which includes freezers. EPA will be evaluating ENERGY STAR levels for each product class and at the conclusion of that process may consider revised Most Efficient levels for the differing product types in 2024.
Dehumidifiers		
General	One stakeholder expressed support for EPA's proposal.	EPA thanks stakeholders for these comments.
Dishwashers		
Criteria	Two stakeholders encourage EPA to increase the stringency for dishwashers.	EPA thanks stakeholders for these comments. ENERGY STAR Version 7 Dishwasher specification goes into effect in June of next year at the same levels as the proposed 2023 Most Efficient levels. EPA understands manufacturers will need to retest most of their models in the next year due to the updated DOE test procedure. EPA will focus on transitioning the dishwasher market to ENERGY STAR Version 7 over the next year and will revisit ENERGY STAR Most Efficient criteria for dishwashers for the 2024 timeframe.
Geothermal Heat Pumps		
General	One stakeholder expressed support for EPA's proposal.	EPA thanks stakeholders for these comments.
Residential Windows and Sliding Glass Doors		
General	One stakeholder expressed support for EPA's proposal and encourages EPA to implement Version 7 no later than October 2023.	EPA intends to complete the ENERGY STAR Version 7 process soon.

Room Air Cleaners		
General	Three stakeholders expressed support for EPA's proposal.	EPA thanks stakeholders for these comments.
Criteria	One stakeholder encourages EPA to consider a sound level reporting requirement similar to that in the ENERGY STAR specification for room air conditioners. EPA has estimated that RACLs are in active mode 16 hours per day.	EPA appreciates this comment and will consider this in the future.
Room Air Conditioners		
General	Two stakeholders expressed support for EPA's proposal.	EPA thanks stakeholders for these comments.
Ventilating Fans		
General	One stakeholder expressed support for EPA's proposal.	EPA thanks stakeholders for these comments.