

August 28, 2017
Via Electronic Mail
MostEfficient@energystar.gov

Re: ENERGY STAR® Most Efficient 2018 Categories

This letter is submitted on behalf of the Program Sponsors of the ENERGY STAR Retail Products Platform (ESRPP) Program in response to the request for input to the ENERGY STAR Most Efficient recognition criteria for 2018. Currently eight utility organizations around the country offer ESRPP in our respective territories, which collectively represent approximately 17% of US households. ESRPP Program Sponsors offer retailer incentives on a portfolio of consumer products, based on ENERGY STAR qualification criteria. We are delighted to see that many of those product categories are on the list for new or revised Most Efficient recognition next year.

ENERGY STAR is a critically important federal program that delivers billions of dollars of energy savings to consumers and business each year. ESRPP Program Sponsors believe the ENERGY STAR Most Efficient designation plays a vital role in signaling to the market where product technologies are headed, and the features and criteria most important to consumers. We welcome the opportunity to provide comments on four product categories that are included as an ENERGY STAR Most Efficient category in 2018, as well as another (Televisions), which we believe should also be under consideration. In addition, some individual Sponsors will be providing separate comments and supporting data.

Clothes Dryers

ESRPP Program Sponsors support EPA's proposal to maintain the ENERGY STAR Most Efficient criteria for dryers and to allow a lower CEF for compact heat pump models, consistent with the ENERGY STAR and DOE Federal Standard. This will allow new models, including those with multi-family installation opportunities, to receive the Most Efficient designation. Additionally, because of their compact size and lower absolute energy consumption compared to full size models, the overall energy consumption of the product category should drop as more of these models are installed.

Clothes Washers

ESRPP Program Sponsors support EPA's proposal to revise ENERGY STAR Most Efficient criteria for clothes washers. We agree with EPA's proposal to update the criteria for standard washers to ≥ 2.92 integrated modified energy factor (IMEF) and ≤ 3.2 integrated water factor (IWF). Additionally, we support EPA's proposed criteria enabling small washers (1.6-2.5 cu-ft.) to earn ENERGY STAR Most Efficient recognition. However, for washers with capacity ≤ 2.5 cu-ft., we believe EPA should consider lowering the maximum IWF requirement to 3.6.

Refrigerators/Freezers

Based on 2017 ESRPP sales data, we are seeing the following market share for Most Efficient in this category:

- Refrigerators 5-7%
- Freezers 0%

For refrigerators, we feel this market share is within the target range for Most Efficient and for our advanced program tier. For freezers, we would hope to see an increase in sales at this tier (as we did see in the 2015 data). For these reasons, we support EPA's proposal to maintain current criteria for this category.

Dehumidifiers

ESRPP Program Sponsors support EPA's proposal to add ENERGY STAR Most Efficient recognition for dehumidifiers. We are adding dehumidifiers to the ESRPP portfolio in 2018, and we believe dehumidifiers are a great addition to the Most Efficient recognition program. Specifically, we support EPA's proposal on limiting the Most Efficient criteria to smaller units with less than 75 pints/day capacity and with an energy factor of 2.3 or higher. This will support recognition of high performing dehumidifiers for consumer applications without overly restricting manufacturers' ability to meet the criteria.

Televisions

While televisions were not listed as a category in the ENERGY STAR Most Efficient 2018 webinar on August 17, we understand that EPA plans to release a proposal for Television Most Efficient recognition criteria after the Version 8 specification is completed. Therefore, ESRPP Program Sponsors are taking the opportunity to provide input for consideration in the Television Most Efficient proposal. ESRPP will be adding UHD televisions to the portfolio in 2018, and we will be working to identify an efficiency tier that both recognizes the top performers in the category, and allows Program Sponsors to have the greatest impact with our limited incentive budgets in this high-volume category.

For the Most Efficient criteria, we recommend EPA lower the UHD allowance from 50% to 12%, or 20% if the Most Efficient criteria also clarify the MDD requirements in the Version 8 specification to make them more quantitative and enforceable. Based on available sales data, and accounting for various scenarios in the Version 8 specification, we estimate this level would have market share of approximately 10%. For reference, NEEA is currently incentivizing UHD TVs at a tier equivalent to a 20% UHD allowance, and seeing market share around 10-15%. We would expect Most Efficient to target slightly lower market share, which could be achieved through a lower UHD allowance and/or other revisions to the Television specification.

In addition to the information provided here, we ask that EPA revisit NEEA's and PG&E's Television V8 comments as they provide excellent data to support establishing the Most Efficient criteria.

We thank EPA for the opportunity to comment on these important changes to its proposed specifications, and we very much appreciate the Agency's responsiveness to stakeholder input. The ESRPP Program and its Sponsors look forward to continuing our work with the ENERGY STAR program.

Respectfully,

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