Comment	EPA Response
A commenter supports the program as it provides an opportunity to differentiate within the ENERGY STAR qualified products, assisting consumers, retailers, and manufacturers. Another commenter suggested that by including the most efficient program within the existing ENERGY STAR program, EPA is increasing the likelihood that consumers will confuse the programs. They recommend that the ENERGY STAR brand and logo be separated from the most efficient pilot.	While 2011 is a pilot year and we will closely track consumer response and reaction, EPA thinks leveraging a trusted, public brand is in the best interest of consumers and the public investment in ENERGY STAR.
A commenter offered that in order for the Most Efficient brand to remain credible and relevant in the market, EPA may need to update the specifications annually for some product categories or cause a lot of market confusion. The required inclusion of the year will help consumers confirm that they are really getting the most efficient models on the market and that it meets the most recent version of Most Efficient. Noting the year is a far superior approach to listing the version of the specification, such as Most Efficient Version 1 or Most Efficient Version 3. Consumers will have no idea what version is current and some product categories might have not been updated while other are on their third specification revision. Another commenter flagged that is critical for home appliances to have the stability of an annual qualification timeline and to be able to maintain the designation on point of sale materials, including the product labeling itself, due to the large amount of planning, manpower, and investment required to change the top tier designation in marketing materials and on showroom floors.	We feel that annual recognition is important and having the date on the signage is important information for consumers. We plan to update criteria on an annual basis and will have all the information available at energystar.gov.
A commenter called for comprehensive consumer research to better understand the viability of this program with all consumers before rolling it out on the scale the EPA is proposing.	2011 is a pilot year. Should we become aware of consumer confusion, we will adjust as needed.
A commenter suggested that by inference, any ENERGY STAR product not designated as “Most Efficient 2011” will be viewed as less efficient and possibly inferior despite dedicated promotion planned for its implementation. When comparing products, consumers will likely view the ENERGY STAR-labeled products as less desirable. By definition, consumers are told to expect no compromise in product performance for ENERGY STAR but the lack of a “Most Efficient 2011” designation will imply a lesser performing product.	2011 is a pilot year. Should we become aware of consumer confusion, we will adjust as needed.

Comment	EPA Response
A commenter noted a concern that the ENERGY STAR message of saving energy would be complicated by the creation of a "Most Efficient 2011" subset. The commenter added that this concern is particularly applicable to the televisions category, where EPA has set requirements for both Most Efficient and ENERGY STAR that are more challenging for large screens, meaning highly efficient, larger- size televisions must meet criteria linked to units with a display area 35-70% smaller.	2011 is a pilot year. Should we become aware of consumer confusion, we will adjust as needed.
There is concern about sales associates being able to meaningfully differentiate the two designations of E*, and if the EPA is intending to provide field support during the on-boarding period.	We will work closely with retailers to minimize any confusion in stores.
A commenter suggested that the estimated annual electricity use amount be included as part of the recognition criteria, as this figure serves as an important guide to consumers, adding that for clothes washers, the requisite amount be equal to or less than 100 kWh/year. Such a standard should help ensure that the EPA's goal of reducing overall energy consumption is achieved.	EPA has, for the most part, tied the Most Efficient criteria to the ENERGY STAR criteria. EPA will, should the program move forward, consider this additional requirement.
A commenter asked if Most Efficient expects to leverage utility incentive programs in order to succeed and noted the importance of ensuring cost effective solutions to the consumer. The commenter also asked what roles utilities and others are expected to play in this program.	The Most Efficient program aims to recognize products that are truly leading edge when it comes to efficiency and acknowledges that although this principle will align with some utility incentive programs, it may not be a fit for all. EPA see environmentally conscious, early adopter consumers as a key target audience for the program. EPA will host a webinar on May 13 for the utility efficiency community to discuss the program and roles.
One of Most Efficient's guiding principles is "no compromise in performance". Ensuring that the qualifying products meet the expectations of consumers will be crucial. Does ENERGY STAR plan to dedicate extra resources towards Most Efficient in the area of certification/verification testing (i.e. verifying a higher percentage of Most Efficient products)? Will that assessment address issues of concern to consumers beyond efficiency (e.g., overall product quality and reliability)?	As an extension of the ENERGY STAR program, all Most Efficient Products will be tested in an EPA recognized lab and certified by an EPA recognized certification body. In additional at least 10 percent of all products certified as ENERGY STAR by a certification body will be subject to verification testing. In addition, EPA will extend its ENERGY STAR market surveillance to Most Efficient.

Comment	EPA Response
Another commenter asked about EPA plans for labeling enforcement and ensuring integrity in the program. The commenter also noted that products that are introduced later in the year, due to factors such as seasonality within a given product categories development cycle, will only be recognized for a limited time. Manufacturers are also not being afforded enough time to develop and market products for the program.	The list of products recognized as Most Efficient will be available on energystar.gov. As a result, any incorrect use of this designation will be easy to identify. EPA will use it's existing infrastructure and process to handle any violations. EPA will during this pilot, evaluate the effectiveness of a calendar year requirements for all products.
Commenter does not support the pilot top tier program for residential furnaces, central air conditioners and heat pumps, and geothermal heat pumps as currently proposed as the proposed criteria need improvements. Commenter recommends that EPA reconsider the criteria to ensure adequate product offerings to consumers for all residential applications. Although we appreciate the opportunity to provide these comments, we recommend that EPA convene an industry stakeholder meeting to discuss various aspects of the whole home approach, the feasibility and approach to top tier products, and to determine the best applicability of the ENERGY STAR program to residential central air conditioners, residential central heat pumps, and furnaces given the complexity of regional federal standards.	EPA has proposed refinements to the recognition criteria for all HVAC products. Through this pilot program, EPA is aiming to recognize truly superior products when it comes to efficiency and does to intend to recognize products of all sizes or configurations.
A commenter offered that the nature of any pilot involves establishing objectives (i.e., what is being tested? what is the focus for learning?) and a research design to collect the information needed to assess the pilot before a full blown program is undertaken. They expressed concern that there has been very little information provided about what ENERGY STAR intends to test or how the pilot will be evaluated. • What are the learning objectives for the pilot?	EPA is currently determining the specific evaluation criteria and plans for consumer feedback. Results will be used to refine efforts in 2012.

Comment	EPA Response
Other tools already exist to help early adopters identify the most efficient products. Since these other programs and ENERGY STAR will co-exist in the market, a commenter offered that it is essential that the work be coordinated with an effort to harmonize the specifications for overlapping product categories. This would avoid potential consumer confusion and leverage the use of limited resources. A lack of clear cooperation risks delaying progress, as market actors would need to sort out on their own how these two programs, one non-governmental, the other, linked to ENERGY STAR, relate to each other. A lack of harmonization also risks sending mixed signals to the marketplace, which could be counterproductive. Furthermore, because other programs offer additional features to help consumers identify and purchase the most efficient products and appliances available in the marketplace, active coordination with them will increase the consumer value of the Most Efficient product list. For example, one program includes a number of useful features for consumers which Most Efficient would be wise to leverage, such as a section on how products are evaluated, where these products can be purchased, whether rebates are available, how to	The job of helping consumers find efficient products is a large one and EPA has a long history of working with a range of partners in doing so. Should this pilot move forward, EPA looks forward to teaming with others in highlighting the Most Efficient products.
When is the earliest date to apply most efficient recognition in earliest ? Can we apply now ? or Will you announce after comment due date ?	With the release of these recognition criteria, EPA is inviting partners to apply for Most Efficient recognition.
A commenter asked EPA for greater transparency regarding the identification of products for inclusion in the program and the development of criteria. An additional commenter asked EPA to base the requirements on a common approach (e.g., to identify the top 2% or 5% of products or a set number of products).	If the pilot program evolves to a full program, EPA will engage stakeholders regarding product selection and criteria. EPA did evaluate the concept of a single approach for all products and determined that tailored requirements fit better the program principle of recognizing the truly exceptional products.
A commenter expressed a concern about possible unexpectedly high levels of qualified products. The commenter prefers recognizing a set amount of top performers that constantly evolves as the leading edge as efficiency evolves, especially in the case of consumer electronics product categories. Another commenter noted that for consumers to understand the difference between base ENERGY STAR and Most Efficient, the number of the most efficient labeled products should remain a limited group that reflects the latest, most efficient products available.	2011 is a pilot year. EPA will monitor the uptake of the program and will consider adjustments to the criteria and timeline for updating them, as needed.

Comment	EPA Response
A commenter asked if EPA worked with the efficiency community on the recognition criteria as well as if EPA will align the release of new criteria with product cycles. Additionally, a commenter asked what the lead time for new product eligibility requests would be and if this would differ depending on when applications come in.	2011 is a pilot year and EPA expects to learn a significant amount during the course of the pilot. Should the pilot program move forward, EPA expects to issue new requirements annually. EPA also anticipates that products will be added during the course of a calendar year following the release of the requirements at the start of the year. EPA will process applications promptly and refresh product listings frequently.
A commenter sought information on plans for the evaluation of this pilot such as the pilot's objectives (i.e., what is being tested? what is the focus for learning?) and a research design to collect the information needed to assess the pilot before a full blown program is undertaken. • What are the learning objectives for the pilot? • What specifically is being tested? • What questions do you hope to answer? • What are the indicators of success? • How will the pilot be evaluated? • What will be the process to share the results and consider program expansion? • What role will stakeholders play as part of the evaluation?	EPA is currently determining the specific evaluation criteria and plans for consumer feedback. Results will be used to refine efforts in 2012.