



August 7, 2020
Via Electronic Mail

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Subject: ENERGY STAR 2021 Most Efficient Criteria

This letter is submitted on behalf of the Northwest Energy Efficiency Alliance (NEEA) and Sacramento Municipal Utility District (SMUD) in response to the request for input to the ENERGY STAR[®] Most Efficient (ESME) recognition criteria. NEEA is a non-profit organization representing an alliance of more than 140 Northwest utilities and energy efficiency organizations working on behalf of more than 13 million energy consumers, and SMUD is a community-owned, electric utility providing reliable and affordable electricity to 1.5 million energy consumers. We are working to encourage the development and adoption of energy-efficient products and services.

NEEA and SMUD strongly support EPA's ENERGY STAR program and the ESME designation. ENERGY STAR is a critically important federal program created with bi-partisan support that annually delivers billions of dollars of energy savings to consumers and business. As such, ENERGY STAR's leadership in setting appropriate ESME voluntary specifications plays a critical role in advancing the efficiency of consumer products by recognizing those products that are superior at meeting consumer's experiential expectations while saving them energy and money.

As key ENERGY STAR Retail Products Platform (ESRPP) program sponsors, we believe that the ESME product categories play a vital role in signaling to the market how product category technologies are evolving and the features and criteria most important to the market and consumers. After review of the proposal, we submit the following comments on the proposed criteria.



Clothes Washers

We support EPA's proposal to continue providing ESME recognition for clothes washers. We are also supportive of the inclusion of laundry centers so that those that choose efficient products can be recognized.

EPA stated in its 2019 response to stakeholders and partners, "Recognizing the superior energy and water performance of the front load design and the intention of ENERGY STAR Most Efficient to recognize products that deliver top efficiency for customers who prioritize it, EPA has maintained one product bin for clothes washers."¹ While we understand the intention of maintaining a single ESME product bin for clothes washers, it has led to ESME recognition being less impactful than it could be.

As stated in our previous comment letter,² in reviewing 2019 ESRPP sales data from NEEA and PG&E, we have found that 29 percent of front-load models and zero percent of top load models meet the proposed ESME 2020 criteria. Unfortunately, this stratification has made it so that ESME is not a significant differentiator for front-load washers – more actually qualify for ESME than only qualify for ENERGY STAR – and unattainable for all top-load washers. As seen in Figure 1 below, if the ESME criteria remained as proposed for 2021, we would expect over half of all front-load models sold to be recognized and no top-loading models to be recognized.

This is particularly concerning because there are more sales of top-loading than front-loading models. EPA also stated in its 2019 letter to partners and stakeholders, "EPA plans to redouble its efforts, in close collaboration with partners, to educate consumers about the benefits of front load washers with the intention of increasing their prevalence in the US market." This is an important effort that we support, but until front-load washers are the dominant product bin, it is important to ensure that all consumers have access and ability to recognize the most efficient products within their market segments. Therefore, we support developing criteria specific to top-loading washers and updating the criteria levels for front-loading washers.

1

<https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Most%20Efficient%202020%20Final%20Criteria%20Memo.pdf>

² <https://www.energystar.gov/sites/default/files/NEEA%2C%20PG%26E%2C%20and%20SMUD..pdf>

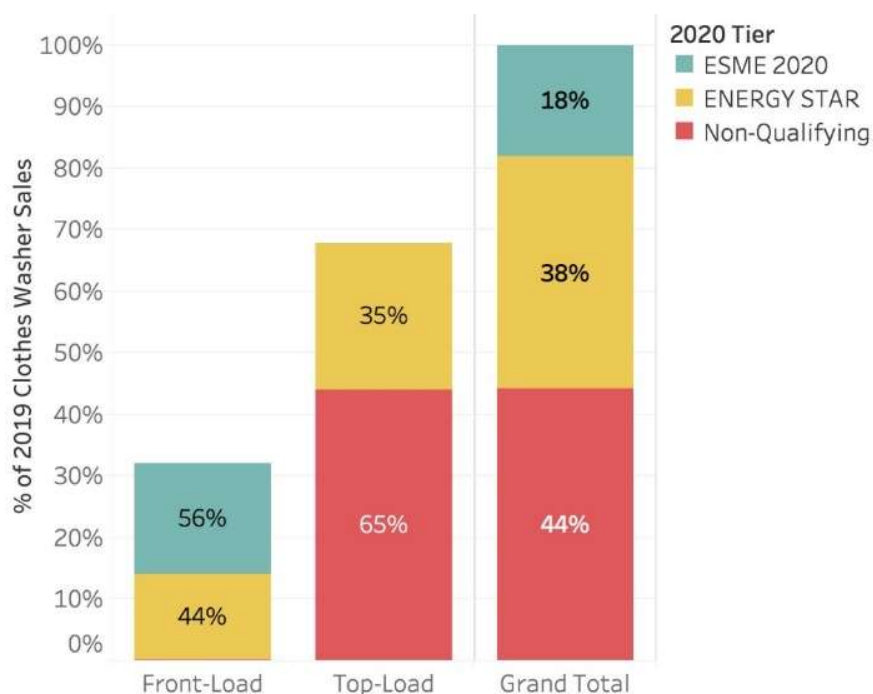


Figure 1. ESRPP clothes washer sales by configuration and efficiency tier (2019 ESRPP Sales in NEEA and PG&E Regions).

There is significant opportunity to enhance the efficiency of the top-loader market. Providing recognition to the most efficient top-loading washers could help to shift the top-loading market segment towards greater efficiency. This segmentation would be consistent with the EPA's previous decision to develop distinct ENERGY STAR criteria for top-load and front-load washers. If the ESME designation is meant to showcase the intended future for the ENERGY STAR specification, separate ESME criteria for top-loaders and front-loaders would more accurately communicate intentions for Clothes Washers v9.

Specifically, we are reiterating our recommendation to update the criteria for standard top-loading washers to ≥ 2.38 integrated modified energy factor (IMEF) and ≤ 3.7 integrated water factor (IWF). This would enable six percent of top-loading 2019 sales from retailers in NEEA and PG&E regions to qualify for ESME, which would provide an important distinction for qualifying models. No top-loading washers qualify under the current proposed criteria. Figure 2 shows the ESRPP sales that would meet each set of requirements.

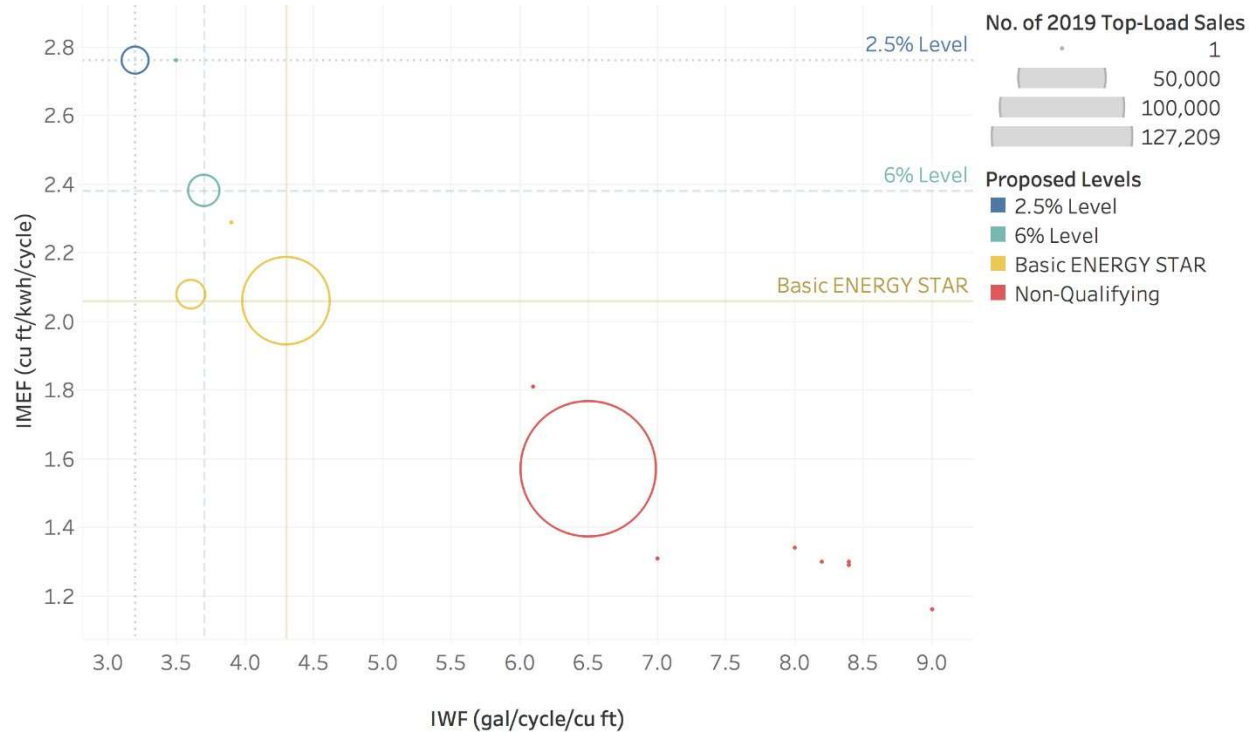


Figure 2. Sales of standard-size (> 2.5 ft³) top-loading clothes washers that would meet various IWF and IMEF requirements (2019 ESRPP Sales in NEEA and PG&E Regions). The position of each circle's center denotes the water and energy efficiency, and the size of each circle indicates the number of sales at that efficiency level. There is a significant gap in efficiency between the top 2.5 percent of top-loading washers and the rest of the ENERGY STAR-qualifying models, so potential top-loader ESME criteria should either be able to recognize 2.5 percent or 6 percent of top-loader sales.



We also recommend updating the criteria for standard front-loading washers to ≥ 3.0 integrated modified energy factor (IMEF) and ≤ 3.2 integrated water factor (IWF). Through our in-depth analysis of the high-efficiency models in the ESRPP sales data, we determined that 20% of front load sales could qualify for ESME at this level. These sales span multiple models, retailers, and manufacturers.

Room Air Conditioners

We are supportive of EPA's proposal to continue the ESME criteria for room air conditioners, as it is helpful to identify the most efficient tier in the market. We would like to reiterate our recommendation that refrigerant reporting be a requirement rather than optional. Refrigerants are a very significant factor when it comes to greenhouse gas emissions.

The current ENERGY STAR specification includes optional connected criteria for products. We are very supportive of developing connected criteria and requirements for products so that they may be energy efficient and demand flexible. We would appreciate if the ESME criteria could have similar connected criteria guidelines so that connected products can be identified and supported.

Televisions

We are supportive of a review of ESME criteria and a delay until the new ENERGY STAR specification is more complete. Please let us know if there are ways in which we can assist with criteria development. We are looking forward to reviewing the proposal when it is released.

Other ESRPP Product Categories

For ESRPP sponsors, it is critically important to have an ESME tier to support development of high-efficiency products across the portfolio. From our review and analysis, we support the proposed levels for clothes dryers and refrigerators. We appreciate that EPA has included criteria specifically for freezers, and we support the level that was chosen to recognize top products. These designations will continue to help our program recognize the most efficient products, and it is encouraging to see that the products covered by ESME are expanding. Overall, the 2021 ESME criteria do not offer designations for some products in the portfolio that could benefit from this higher tier, including room air cleaners and sound bars. Recognizing a higher efficiency level in these products could enable the ESRPP program to more precisely target a tier to the most efficient technologies in alignment with EPA and guide future revisions to the ENERGY STAR specifications.

Our hope is that ESME product designation sends clear market signals of what future energy efficiency recognition through ENERGY STAR or other federal appliance standards will look like. This is helpful messaging for retailers and manufacturers to understand. Having a Most Efficient level makes recognition of the best in class products easier to communicate. In continuing with that communication, we suggest EPA continue to work toward linking ESME criteria to future



ENERGY STAR specifications. This will help better signal to industry how energy-efficient products may be recognized. Continuing to push initiatives like refrigerant reporting and connected criteria will help shape future products. We appreciate the progress EPA has made to date and hope to see more in the future.

We thank EPA for the opportunity to comment on these important changes to its proposed specification, and we very much appreciate the EPA's responsiveness to stakeholder input. NEEA and SMUD look forward to continuing our work with the ENERGY STAR program.

Respectfully,

A handwritten signature in blue ink that reads "Eric Olson".

Eric Olson
Senior Product Manager
Northwest Energy Efficiency Alliance

A handwritten signature in black ink that reads "Jennifer Starrh".

Jennifer Starrh
Product Services Coordinator, Advanced Energy Solutions
Sacramento Municipal Utility District