

June 3, 2021



Mr. James Kwon
ENERGY STAR
U.S. Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Subject: ENERGY STAR® Television Specification V9 Draft 2

Dear Mr. Kwon,

The Northwest Energy Efficiency Alliance (NEEA) submits this letter in response to the request for comments on the ENERGY STAR Version 9.0 TVs Draft 2 Specification. The Northwest Energy Efficiency Alliance (NEEA) is a non-profit organization working to effect market transformation through the acceleration and adoption of energy-efficient products, services, and practices. NEEA is an alliance of more than 140 Northwest utilities and energy efficiency organizations working on behalf of more than 13 million energy consumers.

NEEA continues to support the U.S. Environmental Protection Agency (EPA) efforts to develop the Version 9.0 specification for televisions.

Additionally, NEEA supports the alignment of the Version 9 specification with the Consumer Technology Association CTA-2037C test procedure, "Determination of Television Set Power Consumption and Average Luminance," which uses the NEEA-developed test method as its basis and aligns the testing needs of manufacturers and the EPA. We are delighted by the EPA's outreach to industry partners and willingness to update the specification based on feedback from these stakeholders and look forward to more test enhancements.

Preset Picture Setting and Incentives to Overly Dim

NEEA supports EPA's effort to provide manufacturers with more flexibility in configuring Preset Picture Settings (PPS) by evaluating a TV's overall efficiency (average of three PPSs) rather than the efficiency of each PPS. Additionally, we support EPA's efforts to eliminate the incentive to overly dim one or more preset picture settings to achieve ENERGY STAR, as discussed in the May 11, 2021 webinar and April 22, 2021 letter, by using certification limits for luminance.

Default Configuration and ABC Testing

NEEA supports EPA's Draft 2 proposal of testing TVs in their default configuration, with ABC on if enabled by default. We believe that when enabled by default, ABC can satisfy consumer needs while reducing energy consumption.

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Resolution Adjustment Factor

NEEA agrees with the Draft 2 proposal to apply an equation-based adjustment factor for screen resolutions other than 4K. NEEA understands that the resolution adjustment factor equation is based primarily on analysis of the California Energy Commission TV dataset and, to a lesser extent, on a limited sample of TVs tested with the camera photometer. NEEA recommends that EPA revisit adjustment factor levels as new camera photometer test data becomes available.

High Contrast Ratio (HCR)

NEEA supports the updated adjustment factor for HCR TVs in the near term. NEEA expects that other more efficient HCR or near-HCR technologies will become available at mainstream price points in the long term, at which time NEEA recommends removing the adder.

Standby Power Limits

Additionally, NEEA supports the Standby-Active, Lower Power limit of 1 watt. The data provided by EPA indicate that a significant amount of energy is consumed by many televisions when in Standby-Active Mode. Improving standby power draw can result in considerable energy savings for consumers.

Lastly, in either version 9 or 10 of the ENERGY STAR TV Specification, NEEA encourages the EPA to consider using discrete slope and y-intercept metrics as discussed in the CTA-2037C working group. This method puts the focus on the hardware efficiency gains required to meet slope and y-intercept requirements vs. the Draft 2 metrics which provide an incentive for manufacturers to optimize luminance as a means of complying before investing in durable efficiency gains.

Sincerely,



Eric Olson
Senior Product Manager
Northwest Energy Efficiency Alliance