

June 23, 2021
Via Electronic Mail



Ms. Ga-Young Park
ENERGY STAR
U.S. Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

**Subject: ENERGY STAR® Consumer Refrigeration Products Draft Specification
Version 5.1**

Dear Ms. Park,

The Northwest Energy Efficiency Alliance (NEEA) submits this letter in response to the request for comments on ENERGY STAR Version 5.1 Consumer Refrigeration Products Draft. 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 supports the U.S. Environmental Protection Agency (EPA) efforts to improve Version 5 specification for consumer refrigeration products.

Alignment of Product Names & Definitions

NEEA supports the alignment of product definitions between the EPA and U.S. Department of Energy (DOE) with DOE definitions in 10 CFR § 430.2 for Consumer Refrigeration Products, Miscellaneous Refrigeration Products, and Product Classes. Additionally, NEEA supports updating the definition of “cooler volume” to align with DOE in 10 CFR 430, Subpart B. We believe the harmonization of product definitions reduces the likelihood of consumer confusion and can reduce administrative costs for manufacturers who participate in the ENERGY STAR program.

Change in Specification Scope

NEEA supports the inclusion of Coolers as a Miscellaneous Refrigeration Product (MREF) in version 5.1 and believes the inclusion of these products will incentivize manufacturers to increase efficiency. NEEA understands the decision to exclude combination cooler refrigeration products due to their low count of available models but recommends EPA monitor the sales and popularity of these products for inclusion in future revisions.

Certification Criteria

NEEA supports EPA’s proposed energy savings of 10% - 30% compared to federal standard measured energy use for built-in compact coolers, built-in coolers, freestanding compact coolers, and freestanding coolers.

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Connected Criteria

NEEA recommends that the EPA credit all refrigerators that meet connected criteria, including the products proposed under Version 5.1, to encourage manufacturers to expand the number of products with connected and grid-interactive capabilities. While we understand the attractiveness of demand response for larger loads, additional research should be done on the benefits of demand response for smaller, less load-intensive products.

Version 6.0 Revision Recommendation

Approximately 51% of the refrigerators sold in NEEA's territory are ENERGY STAR certified, supporting NEEA's position that EPA should begin a significant specification update to Version 6. Version 5 went into effect in September 2014, and since 2015 NEEA has seen the average market penetration in our territory of ENERGY STAR refrigerators increase from 38.5% in 2015 to 51% in 2020. These figures align with the EPA's estimates of 46-48% based on national shipment data (and excluding compact refrigerators). The high penetration of ENERGY STAR refrigerators indicates that the testing and performance specifications can reasonably be made more stringent with the increase of availability and affordability of more efficient components such as inverter compressors, advanced controls, and vacuum insulated panels.

Eric Olson



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Northwest Energy Efficiency Alliance