

December 22, 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 Final Draft

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 Final Draft 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 and are glad to see the release of the final draft. We are pleased with 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. Furthermore, NEEA supports the updates and clarifications in the final draft including, the revised definition of High Contrast Ratio (HCR) and the updated Preset Picture Setting (PPS) requirements and interpolation instructions.

NEEA has conducted additional testing and analysis of HCR-enabled televisions, including the five models included in the Limited Topic Proposal. We were pleased to see that one model met the final ENERGY STAR specification without the HCR adjustment in our updated analysis. We believe this indicates that HCR-enabled televisions can meet the same performance standard as other televisions without an adjustment factor and that their efficiency will continue to improve in the future. NEEA encourages ENERGY STAR to consider the performance of the televisions in the attached dataset and evaluate if the HCR adjustment factor is necessary or if it can be reduced to encourage manufacturers to continue improving their products' energy use.

Sincerely,

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

Eric Olson
Manager, Emerging Technology and Product Management

Attachment