

August 28th, 2017
Via Electronic Mail



Ann Bailey, Manager
ENERGY STAR Product Labeling
US Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, DC 20460

Subject: ENERGY STAR 2018 Most Efficient

This letter is submitted on behalf of the Northwest Energy Efficiency Alliance (NEEA) in response to the request for input to the ENERGY STAR Most Efficient (ME) recognition criteria. NEEA is a non-profit organization working to encourage the development and adoption of energy-efficient products and services. NEEA has long been a strong supporter of the ENERGY STAR program for a number of products, including Most Efficient product category recognition. We are very supportive of the Most Efficient Program and the important role it plays in advancing the efficiency of consumer products. As a key ENERGY STAR Retail Products Platform (ESRPP) program sponsor, NEEA believes the Most Efficient product categories play a vital role in signaling to the market where product category technologies are headed and the features and criteria most important to the market and consumers. Therefore, NEEA applauds EPA for its proposal for 5 of the 9 product categories in the ESRPP. After review of the proposal and information presented in the August 17th webinar, NEEA submits the following comments on the proposed criteria.

Televisions

Understanding that EPA is awaiting completion of the version 8 specification prior to releasing comment, NEEA is taking the opportunity to provide input for consideration in the Television ME comments. So, in follow up to NEEA's comments on the Television v8 drafts and EPA's final proposed specification, we respectfully submit the following points:

Minimum Brightness Requirement for Automatic Brightness Control (ABC) – In the absence of compelling data from manufacturers showing otherwise, NEEA recommends staying the course and requiring a minimum brightness of 125 lumens at 3 lux.

Maximum number of Preset Picture Settings without ABC – NEEA believes manufacturers will determine effective ways to comply with the proposed v8 requirements for preset picture settings with ABC enabled. Therefore, this requirement is not expected to have a significant impact on the active-mode power.

Mandatory notification for disabling ABC – The proposed v8 requirement for mandatory notification for disabling ABC is not difficult to implement and we are not aware of any objections raised by manufacturers in prior EPA comments. Therefore, this requirement is not expected to have a significant impact on the active-mode power.

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Testing Requirement for utilizing Motion Detection Dimming (MDD) - As the language is currently proposed we are concerned that manufacturers will not be motivated to make changes to their products MDD operation. If the v8 language stays as is and manufacturers don't make changes to MDD operation we recommend EPA lower the UHD adder to 20%, down from the current level of a 50% allowance. If, however the language in v8 for MDD operation is revised with additional clarification of how to meet that clause then we can provide a data driven recommendation to EPA how far to lower the UHD adder based on scenarios dictated by the new language, down from the current level of a 50% allowance.

We look forward to reviewing the completed Television v8 specification and for the opportunity to provide data analysis results to guide setting the Most Efficient recognition criteria at an appropriate level.

Clothes Dryers

NEEA supports EPA's proposal to maintain ENERGY STAR Most Efficient recognition for dryers. Although the number of ME models is very small new products recently entered market that increase consumer options. Therefore, we are very supportive of the proposal to set different levels for the compact units, consistent with the ENERGY STAR and DOE Federal Standard. This will allow new models, including multi-family installation opportunities, to meet the Most Efficiency Criteria. Additionally, because of their compact size and absolute lower energy consumption compared to full size models, the energy consumption of the product category should be driven downward.

Clothes Washers

NEEA supports EPA's proposal to add ENERGY STAR Most Efficient recognition for clothes washers. We agree with increasing the stringency for standard size washers so that they exceed new ENERGY STAR levels that will take effect early in 2018. Additionally, with the differentiation in the performance of small volume washers, we support EPA's proposed criteria enabling small washers to earn ENERGY STAR Most Efficient recognition.

In alignment with EPA's proposal, NEEA recommends updating the criteria for standard washers to ≥ 2.92 integrated modified energy factor (IMEF) and ≤ 3.2 integrated water factor (IWF). However, for washers with capacity $\leq 2.5 \text{ ft}^3$, EPA should consider lowering the maximum requirement to 3.6.

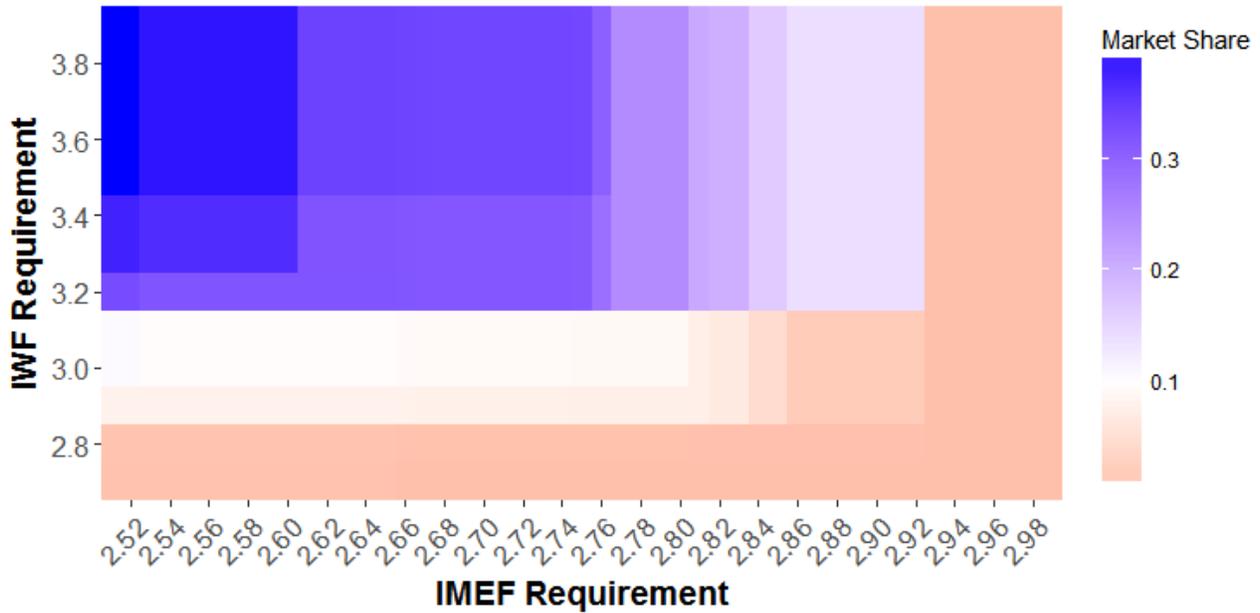


Figure 1. Market share of standard (> 2.5 ft³) clothes washers that would meet various IWF and IMEF requirements (2016 RPP Sales in NEEA Territory)

2017 ESRPP data shows that the standard size (> 2.5 ft³) models that would qualify for the proposed ME levels consist of 12% of 2016 sales from the retailers in NEEA territory participating in ESRPP. In addition, Figure 1 shows how the market share of qualifying models in NEEA territory would change under various IMEF and IWF levels for ME requirements. This assessment suggests that market share would likely be too small, should EPA lower the IWF requirement, or increase the IMEF requirement, beyond proposed levels. Therefore, NEEA supports EPA’s proposal for standard size clothes washers.

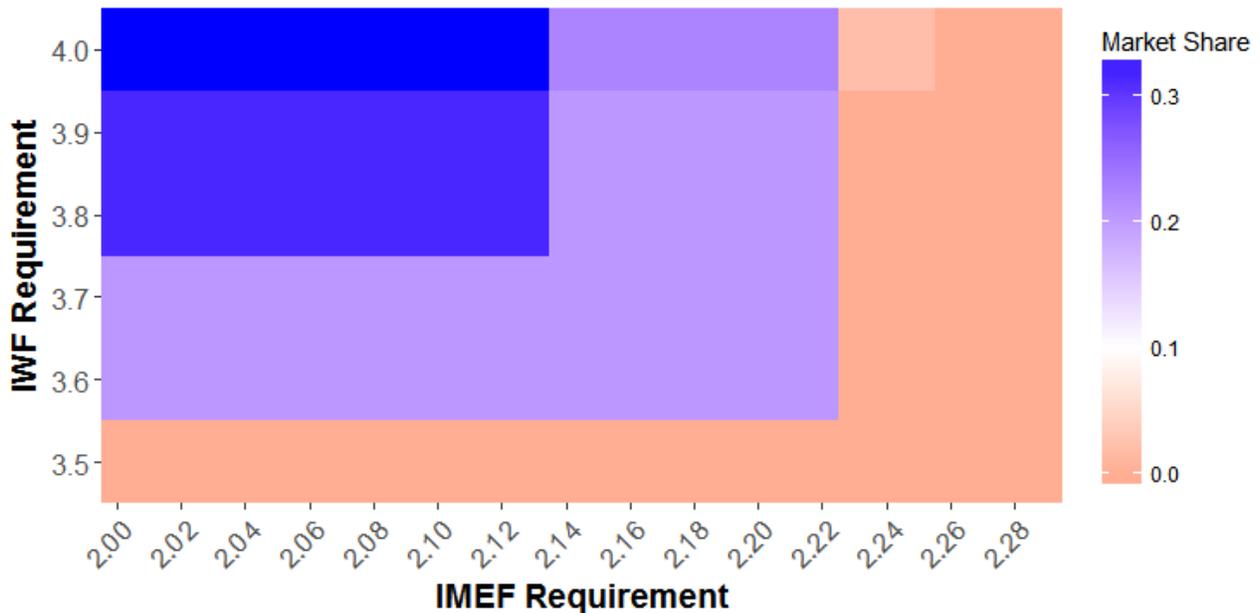


Figure 2. Market share of mid-sized (> 1.6 ft³, ≤ 2.5 ft³) clothes washers that would meet various IWF and IMEF requirements (2016 RPP Sales in NEEA Territory)

2017 ESRPP data shows that the mid-sized ($> 1.6 \text{ ft}^3, \leq 2.5 \text{ ft}^3$) models that would qualify for the proposed ME levels consist of 20% of 2016 sales from the retailers in NEEA territory participating in ESRPP. In addition, Figure 2 shows that there is not a suitable intermediate requirement (except for a much higher IWF requirement) that would lower the market share of qualifying models, while remaining greater than zero. However, the analysis also suggests that the same market share can be achieved by lowering the IWF requirement to 3.6. Therefore, NEEA suggests that EPA lower the maximum IWF requirement to 3.6

Refrigerators/Freezers

NEEA supports EPA’s proposal to maintain current criteria for this category as we believe the market share is within the target range for Most Efficient intentions.

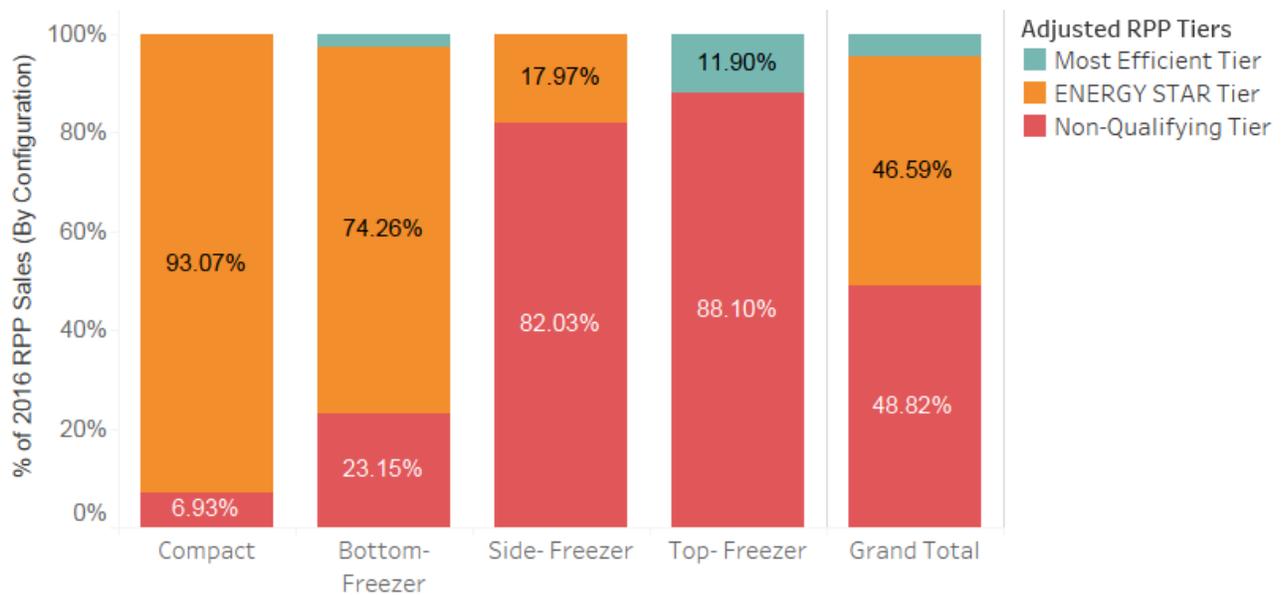


Figure 3. Market share of refrigerators sold in NEEA territory (from 2016 NEEA RPP Sales) by configuration.

Figure 3 shows the share of the NEEA RPP refrigerator market that qualified to ME levels in 2016. While most qualifying sales are top-freezer refrigerators, the aggregated values show that 5% of refrigerators meet the ME levels. As a result, we support EPA’s proposal to maintain current criteria for this category.

Dehumidifiers

NEEA supports EPA’s proposal to add ENERGY STAR Most Efficient recognition for dehumidifiers. We believe dehumidifiers are a great add to the Most Efficient recognition program. Specifically, we support EPA’s proposal on limiting the Most Efficient criteria to the smaller units with less than 75 pints/day capacity with an energy factor of 2.3 or higher. This will support recognition of high performing dehumidifiers for consumer applications

and not pick favorites by extending the criteria such that only one brand could meet it in the large capacity models.

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

Respectfully,

A handwritten signature in black ink, appearing to read "Nick Leritz", with a long horizontal line extending to the right.

Nick Leritz
Senior Product Manager
Northwest Energy Efficiency Alliance