

October 4, 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 HCR Criteria

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. We support 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.

NEEA has reviewed EPA's data provided with the September 9, 2021, ENERGY STAR Televisions Version 9.0 Limited Topic Proposal documenting On Mode Power¹ for five additional televisions. Based on the analysis provided, NEEA supports EPA's proposal of using a universal HCR Adjustment factor of 1.12 to incentivize the top-performing TVs with individual pixel control.

Sincerely,

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

Eric Olson
Senior Manager
Emerging Technology and Product Management
Northwest Energy Efficiency Alliance

¹ <https://bit.ly/3AafbvF>