

August 15, 2022
Via Electronic Mail



Ann Baily
Director, ENERGY STAR Product Labeling
U.S. Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, D.C. 20460
MostEfficient@energystar.gov

Subject: ENERGY STAR® Most Efficient 2023 Criteria

Dear Ms. Baily

This letter is submitted on behalf of the Northwest Energy Efficiency Alliance (NEEA) and the Northwest Power and Conservation Council (Council) staff in response to the request for comments on the proposed 2023 ENERGY STAR Most Efficient Products efficiency levels.

NEEA is a non-profit organization representing an alliance of more than 140 Northwest utilities and energy efficiency organizations working on behalf of more than 13 million energy consumers. We encourage the development and adoption of criteria recognizing energy and water-efficient products that help consumers save on utility bills.

The Council is an interstate compact agency (i.e., government agency) formed in 1981 by the states of Idaho, Montana, Oregon, and Washington as authorized by Congress in the Pacific Northwest Electric Power Planning and Conservation Act of 1980 (Northwest Power Act). The Northwest Power Act charged the Council with developing a regional power and conservation plan to assure the Pacific Northwest an adequate, efficient, economical, and reliable power supply. The Northwest Power Act designated cost-effective energy efficiency as the priority resource to be relied upon to meet future power needs.

We strongly support the U.S. Environmental Protection Agency's (EPA) ENERGY STAR program. ENERGY STAR is a critically important federal program created with bi-partisan support that delivers billions of dollars of energy savings to consumers and businesses annually. As such, ENERGY STAR's leadership in setting appropriate product specifications is critical in advancing the efficiency of consumer products that meet experiential expectations and save consumers energy and money.

NEEA is pleased to see that EPA has updated the Most Efficient performance levels for many of the ENERGY STAR categories, and we are happy to provide the following feedback.

Ceiling Fans:

NEEA supports EPA's proposed criteria for all ceiling fans recognizing the top performing fans, offering approximately 67% savings over Department of Energy (DOE) savings.

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Central Air Conditioners and Heat Pumps and Ductless Air Conditioners and Heat Pumps:

NEEA backs EPA's proposal updating the Most Efficient performance levels to Version 6.1 and including optional capabilities in Version 6.1 that allow automatic reconfiguration of units. We agree that including compressor staging in QPX allows automatic recognition of dual and multistage units. These changes will reduce the burden on manufacturers and increase participation in ENERGY STAR Most Efficient for manufacturers.

Clothes Washers and Dryers:

NEEA supports EPA's proposal to maintain the 2022 Most Efficient criteria for 2023. NEEA also recommends improvements to the current test procedures to incorporate additional cycles and load sizes to differentiate ENERGY STAR washers and dryers from non-ENERGY STAR products. NEEA's research has uncovered large discrepancies in energy usage when changing cycle settings from the current Department of Energy specified loads¹, revealing a significant opportunity to reduce the energy consumption of clothes washers. Additional NEEA research has demonstrated that DOE's energy consumption estimates for both wash and dry cycles, specifically in matched pairs, typically underestimate the energy consumption of the appliances when used with real world textiles and various cycle settings.² These findings underscore the importance of improved test methods and present an opportunity for a paired washer-dryer ENERGY STAR specification.

Computer Monitors:

NEEA supports EPA's recommendation to update the Most Efficient criteria for computer monitors representing approximately 10% of ENERGY STAR models. We encourage ENERGY STAR to investigate energy savings opportunities by using ANSI/CTA-2037D, "Determination of Television Set Power Consumption," as a basis for updating the test standard and efficiency levels for computer monitors and commercial displays.

Dehumidifiers:

NEEA supports the EPA's proposal to maintain the current 2022 for 2023.

Geothermal Heat Pumps:

NEEA supports the proposal to recognize all models that meet the current ENERGY STAR criteria as Most Efficient.

Refrigerators-Freezers, including compact models:

Top Freezers:

NEEA supports EPA's proposal to maintain the current criteria of being 10% or more efficient than the Federal minimum for Top Freezer models.

Bottom and Side Freezer Models:

NEEA suggests that EPA reevaluate the performance standards established for side freezer and bottom freezer models. An analysis of the current Emerging Technology Qualified Products List³ reveals that the eight base models referenced by EPA do not include any of the more than 60 base models from major manufacturers. These excluded models have demonstrated that they are 25% to 58.4% more efficient than the DOE-required efficiency levels when measured under more realistic use conditions but are excluded

¹ <https://neea.org/resources/coming-clean-revealing-real-world-efficiency-of-clothes-washers>

² <https://neea.org/resources/perfect-pairings-testing-the-energy-efficiency-of-matched-washer-dryer-sets>

³ [2020-2021 Advanced Adaptive Compressors | ENERGY STAR](#), visited August 11, 2022

from the 2023 Most Efficient models, significantly impacting the availability of Most Efficient products to everyday consumers.

Compact Refrigerators:

NEEA supports EPA's proposal to maintain the 2022 Most Efficient levels for 2023.

Room Air Cleaners:

NEEA is pleased to see the addition of Room Air Cleaners to the Most Efficient List, and we support ENERGY STAR's proposed performance levels.

Room Air Conditioners:

NEEA supports EPA's proposed revision to the Most Efficient Criteria to 35% better than the Federal Standard. We have been encouraged by the adoption of these more efficient models in our territory and are pleased with manufacturer participation in the Most Efficient level of performance.

Ventilating Fans:

NEEA supports maintaining the 2021 Most Efficient criteria for ventilating fans. We are pleased to see EPA encouraging manufacturers to report noise data for their fans so that they qualify as Most Efficient.

Windows and Sliding Glass Doors:

NEEA supports ENERGY STAR's v7 final specification for Residential Windows, Doors and Skylights and encourages EPA to implement v7 no later than October 2023.

General Comments:

NEEA encourages EPA to consider requiring the reporting of refrigerants for all relevant Most Efficient products. The use of low-Global Warming Potential refrigerants (GWP) is of increasing interest to utilities across the country, and ENERGY STAR can play a crucial role in collecting and reporting this data.

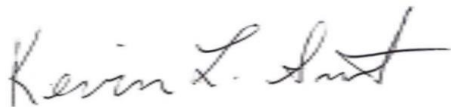
Thank you,



Eric Olson

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