



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

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Ms. Bailey,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program on the proposed updates to the 2018 Most Efficient Program. In general, NEEP is incredibly supportive of the Most Efficient Program and the important role it plays in advancing the efficiency of consumer products. After review of the proposal and attendance at the August 17<sup>th</sup> webinar, NEEP respectfully submits the following comments on several of the proposed changes.

### **Clothes Washers**

Given the recent specification completion and the changes in the clothes washer market, NEEP is very supportive of EPA's attempts to update the specification for Most Efficient Clothes Washers. Both the changes in scope and proposed levels are appropriate and will help this market further develop as there are more savings to be had.

### **Clothes Dryers**

Clothes dryers are a significant energy end-use and NEEP once again applauds EPA for including that product category into their Most Efficient Portfolio. Through work with efficiency programs in the northeast and through the Retail Products Platform (RPP), we have seen that the number of Most Efficient units being sold is very small. As such, NEEP is supportive of the proposal to set different levels for the compact units, consistent with the ENERGY STAR and DOE Federal Standard. This should allow more models to meet the Most Efficiency Criteria and while on the surface these may seem to be less efficient models, in the end because of their compact size, the energy consumption of the product category should be driven downward.

### **Dehumidifiers**

NEEP is very excited that EPA is considering adding dehumidifiers to the Most Efficient program. After discussion through the public webinar on 8/17, NEEP supports EPA's proposal on limiting the Most Efficient criteria to the smaller units and at the levels proposed. This will both recognize those high performing dehumidifiers for consumer applications as well as not pick manufacturing favorites by



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extending the criteria such that only one brand could meet it in the large units. NEEP supports the proposal as it stands.

### **Computer monitors**

Given the recently completed CEC standard for computers including monitors, and the fact that several states throughout the nation are considering adopting those standards as well, it makes a lot of sense to revise the monitors ENERGY STAR Most Efficient specifications. The levels proposed seem very sound to allow for differentiation between the highest performers and what might become the minimum for several states.

Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP to provide comment to the 2018 Most Efficient program. ENERGY STAR is and must continue to serve in a leading role in recognition of high performing products, and NEEP looks forward to continuing to support ENERGY STAR's efforts into the future. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a long horizontal flourish at the end.

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