



Ann Bailey, Director
ENERGY STAR Product Labeling
1200 Pennsylvania Avenue
NW MC 6202J
Washington, DC 20460

September 5, 2013

Ms. Bailey,

NEEP appreciates the opportunity to provide comments to the ENERGY STAR Most Efficient program as it updates criteria for 2014 across 11 product categories. Members of NEEP's Market Strategies team participated in the August 22nd webinar discussion of the proposed criteria, and after a careful review, we would like to submit the below comments on some of the specific technology categories.

Boilers:

- We support the criteria Most Efficient has established for boilers. While 90 AFUE or higher may be a challenge for oil boilers to meet, we feel that is an appropriate level such that if a boiler cannot meet it, it should not be considered Most Efficient.

Central Air Conditioners:

- While we fully support these criteria for 2 ton and larger systems, we feel that the 18 SEER criteria will be very challenging for a 1.5 ton [18K BTU] AC unit. For very small homes built to ENERGY STAR level standards in the Northeast and Mid-Atlantic region (and other parts of the country with relatively cool summers), a 1.5 ton AC unit can be sufficient for cooling. Additionally, AC systems are already frequently oversized, which can result in insufficient dehumidification and general efficiency loss due to short-cycling. We feel that for situations where a 1.5 ton AC unit is sufficient, it is better to use less total energy, even if the system itself is less efficient. By excluding 1.5 ton AC units from being marketed as "Most Efficient," there is the potential to further encourage AC system oversizing. As such, we suggest ENERGY STAR Most Efficient consider introducing a lesser SEER/EER ratings for split 1.5 ton AC systems.
- NEEP would also appreciate a more detailed description of what the "automatic setup, monitoring, and service messaging capabilities" are and how they ensure the products are operating as intended.

Air-Source Heat Pumps and Ductless AC and Heat Pumps (combined comments):

- We feel that ENERGY STAR should expand their consideration of regionally specific criteria, as is currently being done for the base ENERGY STAR criteria, to the Most Efficient category, especially for products that provide heating and/or cooling. This separation would enable consumers to identify products that have been engineered/optimized for either the heating functionality OR cooling functionality. It is often the case that capacity and efficiency can be improved for one function but more difficult to do both simultaneously.
- Capacity and COP measured at low temperatures will give additional information about heating efficiency when it gets cold out, typical of winter conditions in the North. ENERGY STAR Most Efficient should consider incorporating these metrics into their requirements for products predominantly used to heat (potentially Northern requirements).
 - See [Efficiency Vermont's requirements](#) as an example.
- NEEP is in the process of developing a [regional market strategy report](#) for air source heat pumps (ASHP), both ducted and ductless. The ASHP Strategy report, scheduled for an early October 2013 publishing, will likely address metrics that are more relevant to cold climate performance. NEEP may have more to share at that time.

Computer Monitors:

- NEEP supports the criteria established for Most Efficient computer monitors. While monitors are diminishing in their market share and popularity, there is still a large amount of energy



savings potential and these criteria appropriately identify the best products in the market. NEEP recently completed a [Business and Consumer Electronics report](#) which further describes the market for efficient computer monitors and feels that commercial or small businesses are the primary audience for computer monitors.

Furnaces:

- We support the criteria set forward regarding furnace efficiency and feel it is appropriately stringent to apply to only the most efficient products in the market, though would appreciate a more detailed description of what the “automatic setup, monitoring, and service messaging capabilities” are and how they ensure the products are operating as intended.

Geothermal Heat Pumps:

- NEEP supports the criteria set forward regarding Geothermal Heat Pumps, though would appreciate a more detailed description of what the “automatic setup, monitoring, and service messaging capabilities” are and how they ensure the products are operating as intended.

Televisions:

- NEEP supports the more stringent requirements for televisions for the 2014 Most Efficient products, as this product category continues to rapidly evolve and we feel that ENERGY STAR Most Efficient has the opportunity to be a leader in ensuring only the stand-out products earn that label. NEEP recently completed a [Business and Consumer Electronics report](#) which further describes the market for efficient televisions. Some of the relevant findings and recommendations include supporting new technologies such as OLED, as well as energy efficiency programs limiting support of televisions to larger sets which offer the highest energy savings.

Ventilating Fans:

- We support the criteria put forward for ventilating fans, as this seems to be a product category that has not made significant efficiency gains in the past few years, but still offers great savings over baseline or standard ENERGY STAR products.

Thank you again for conducting a productive process. Please contact us with follow up questions or clarifications.

Sincerely,

David Lis
 Senior Manager, Appliance Standards
 and Market Strategies
 Northeast Energy Efficiency
 Partnerships (NEEP)
djlis@neep.org
 781-860-9177 x127

Claire Miziolek
 Residential Program Manager
 Northeast Energy Efficiency
 Partnerships (NEEP)
cmiziolek@neep.org
 781-860-9177 x115

Kevin Rose
 Building Energy Technical Associate
 Northeast Energy Efficiency
 Partnerships (NEEP)
krrose@neep.org
 781-860-9177 x158