NRDC Comments on EPA's ENERGY STAR Most Efficient 2018 Proposed Criteria

August 28, 2017

On behalf of the Natural Resources Defense Council (NRDC) and its more than 2 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's proposed criteria for the Most Efficient 2018 label. NRDC has been a longtime supporter of the ENERGY STAR program and continues to strongly support the addition of the Most Efficient designation to the program. Most Efficient fills a much-needed gap by allowing consumers to identify top performing products. We offer the following general comments on the Most Efficient program and the proposed Most Efficient criteria for 2018.

General Comments on the Most Efficient Program

NRDC strongly supports the continuation of the Most Efficient program. The ENERGY STAR Most Efficient program fills an important role in identifying the best of the best products. The Most Efficient designation provides valuable information to early adopters of highly efficient products, who may be motivated by their environmental benefits. These early adopters play an important role in shifting markets towards greater efficiency and the Most Efficient label is an important tool to influence their purchasing decisions. We are thus very pleased with the continuous Most Efficient web updates providing real-time data on product price and location features, which we believe will boost the label's exposure and market share. In addition, having a set of recognized higher efficiency levels often serve as a clear target for leading manufacturers to pursue and in some cases utilities offer higher incentives for products that meet the Most Efficient requirements. This drives sales, can drive down production costs and pave the way for future adoption as Energy STAR specs.

It is particularly encouraging to see the rapid increase in sponsors and retailers actively supporting the Most Efficient label through the ENERGY STAR Retail Products Platform, and we are excited about its expansion. We continue to strongly support the Most Efficient program and are encouraged by the progress it has made since the program's inception.

NRDC supports the continuous updating of the Most Efficient criteria as appropriate, and we are pleased to see EPA's ongoing commitment to review the Most Efficient criteria annually. Having up to date specifications that continue to reflect the top performers is important to develop and maintain the strength of the Most Efficient brand. EPA should continue to update the levels each year as appropriate to keep the specifications fresh. We support the addition of dehumidifiers to the list of products covered by the program and agree with EPA's decision not to include TVs in 2018. Once the issues with the test procedure for measuring TV energy use are adequately resolved and the Energy STAR specification, Version 8, has been issued, EPA should look to reincorporate the category to its Most Efficient program.

We also recommend that EPA consider expanding the Most Efficient program to include commercial products for the 2019 specification.

Comments on Proposed Specifications

NRDC generally supports the proposed criteria for the 2018 Most Efficient specifications with the following specific comments.

Clothes Washers

We are pleased with the first-time inclusion of small volume products ranging from 1.6 to 2.5 cubic feet, as there is now enough data and efficiency differentiation for these products on the market. We also support the tightening of the energy factor. However, we recommend adding a cleaning test in the future to ensure that basic clothes-cleaning functionality will be maintained at these very low levels of energy and water use.

Dishwashers

NRDC supports maintaining the Most Efficient criteria for dishwashers at 2017 levels for 2018, as it continues to recognize an exclusive group of top performers offering considerable energy and water savings compared to conventional dishwashers. We also support the addition of a cleaning test.

Refrigerators

NRDC supports maintaining the criteria for bottom mounts and side-by-sides at 2017 levels given both the compelling energy savings achieved by the Most Efficient products (at least 15% savings compared to products just meeting the federal minimum) and the appropriate number of products on the market meeting the 2017 Most Efficient criteria. However, we recommend that the criteria for top mounts be revised and tightened. Top mounts account for a large portion of the market, and a quarter of the products sold already meet the Most Efficient criteria. We thus recommend that the criteria be revised to make sure that it still reflects the best of the best in the top mount category.

Clothes Dryers

NRDC agrees with the rationale to maintain the Most Efficient criteria for clothes dryers at 2017 levels for 2018. Considering that the number of products meeting the criteria is growing, we strongly support that EPA continue to monitor the market to possibly update the recognition criteria for 2019 and raise the bar to keep rewarding the best of the best and delivering on the large energy savings potential this product category offers.

Ceiling fans

NRDC supports the revised criteria for small blade span fans and the addition of the new 36-inch cut off point, consistent with the revised Energy Star specifications, version 8.

Ventilating fans

NRDC supports EPA's rationale behind maintaining the Most Efficient criteria for ventilating fans at 2017 levels for 2018. The current levels achieve very strong savings and products meeting the specs remain limited. That said, the increase in availability is promising and warrants closely monitoring the market for a potential update to the criteria.

Furnaces

NRDC agrees with maintaining the specifications at a minimum of 97 AFUE, as we are not aware of furnaces exceeding 98 AFUE. We thus agree that the current levels still reflect the top performing furnaces.

Boilers

NRDC supports EPA's rationale behind maintaining the Most Efficient criteria for boilers at 2017 levels for 2018. We also strongly support that EPA keep considering opportunities to raise the stringency of the criteria in the future and ensure that it captures the very best of products on the market.

Dehumidifiers

NRDC supports establishing Most Efficient criteria for dehumidifiers. However, we encourage EPA to attempt to ensure that the criteria will boost the market for high-efficiency portable dehumidifiers, which DOE estimates represent about 99% of total dehumidifier sales.[1]

The proposed criteria for dehumidifiers include a minimum energy factor (EF) of 2.3, and EPA notes that three ENERGY STAR Partners have products that meet this efficiency level.[2] However, based on a review of the ENERGY STAR Certified list of dehumidifiers, it appears that all of the current products with an EF at or above 2.3 are whole-home dehumidifiers. While we are not opposed to whole-home dehumidifiers receiving Most Efficient recognition, we think the criteria will be most effective if it they can influence the portable dehumidifier market.

We encourage EPA to evaluate whether portable dehumidifiers can meet the proposed 2.3 EF. An alternative could be to specify a slightly lower EF such as 2.15 or 2.2. Based on a review of the DOE compliance certification database, there appear to be 21 portable dehumidifier models with capacities less than 75 pints/day with rated EFs of at least 2.15, 9 of which have rated EFs of at least 2.2.

Computer Monitors

NRDC supports the revised 2018 criteria as it captures better the products in larger sizes. We are also pleased and encouraged to see that 15 percent of products met the 2017 Most Efficient criteria, as computer monitors are typically considered a slow-moving category.

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[1] https://www.regulations.gov/document?D=EERE-2012-BT-STD-0027-0046. p. 9-8.

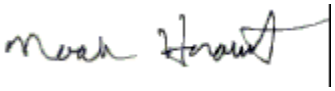
[2] https://www.energystar.gov/sites/default/files/ENERGY%20STAR%20Most%20Efficient%20Stakeholder%20Webinar_1.pdf. p. 33.

Residential Windows

NRDC supports maintaining the Most Efficient Criteria at 2017 levels for 2018, given that the number of products on the market meeting the criteria remains small. We also strongly support that EPA keep considering including specifications for advanced dynamic window products for its Most Efficient 2019 proposed criteria.

Thank you for the opportunity to submit these comments.

Sincerely,



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