

April 23, 2012

Ms. Katharine Kaplan
EPA Team Lead, ENERGY STAR® Product Development
U.S. Environmental Protection Agency
Washington, DC 20460

Dear Ms. Kaplan:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the Environmental Protection Agency's March 20 request for comments on its revisit of the ENERGY STAR Version 4.0 set-top box specification.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and eight Canadian provinces. In 2011, CEE members directed \$7.8 billion of energy efficiency program budgets in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as our national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

CEE Commends EPA's Proactive Review of the Specification

CEE commends EPA for revisiting the preannounced Version 4.0 requirements significantly in advance of their July 1, 2013 effective date. This process helps to ensure that ENERGY STAR requirements accurately reflect market conditions at the time they take effect, and that ENERGY STAR labeled products consistently deliver on the brand's promise.

CEE Supports Reference to a Final Test Procedure

CEE is aware that the set-top box specification may be revised to reference one or more still-evolving test procedures for measuring energy use—CEA-2043, and that which is now being developed by the U.S. Department of Energy. CEE seeks clarification from EPA on its intended timing for revising the specification to reference one or both of the identified test procedures. CEE would also like to better understand implications to manufacturers, channel players and

retailers for resulting changes to product qualification that may derive from revising the specification's referenced test procedure (prior to the July 1, 2013 effective date, or at some time thereafter).

Other Issues

At this time, CEE offers no further comment on other matters associated with the specification, except to note that it remains difficult for CEE to assess proposed specification requirements without sufficient information on market penetration, the incremental retail price effects of higher efficiency, and projected energy savings. This same information is a critical input to efficiency programs in setting program incentives, and likewise to EPA in calculating the cost effectiveness of the proposed levels—a core tenet of the ENERGY STAR Program. We therefore encourage EPA to continue to seek out reliable sources of this information toward building a highly robust specification.

CEE would once again like to thank EPA for the opportunity to comment on the Version 4.0 specification. Please contact CEE Senior Program Manager Margie Lynch at 617-337-9277 with any questions about these comments.

Sincerely,



Ed Wisniewski
Executive Director