

January 20, 2012

Christopher Kent  
US Environmental Protection Agency  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Mr. Kent:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the *ENERGY STAR® Residential Pool Pump Specification Framework*, released by the Environmental Protection Agency (EPA) on November 29, 2011.

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 over \$7.8 billion of energy efficiency program budgets in the two countries. In short, CEE's Members work to strengthen ENERGY STAR as a platform for energy efficiency across North America.

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.

## Scope

CEE applauds ENERGY STAR's efforts to develop a pool pump specification that identifies energy efficient products and to update the current test procedure for enhanced repeatability. The scope identified in the framework document is highly consistent with CEE member programs, which primarily promote variable speed, inground pool pumps with integrated controls. We agree that this scope is appropriate for the first version of an ENERGY STAR specification.

## Efficiency Criteria

With respect to identifying energy efficient products, we favor a technology neutral, energy factor metric identified through the process of developing a Draft CEE Residential Swimming Pool Initiative and specification. In developing this approach, CEE consulted with industry regarding the applicability and accuracy of an energy factor metric to differentiate energy performance, and received favorable responses. Based on this feedback, CEE is developing a pool pump specification using energy factor requirements as the basis for qualification. The forthcoming CEE specification is part of CEE's proposed Residential Swimming Pool Initiative which we plan to present to industry later this month. CEE intends to share this draft document with all interested stakeholders and we invite EPA to consider the approach we have taken in regards to developing the metric. We plan to complete our industry vetting process and release the specification by the end of April 2012, subject to Board of Directors approval. At that time, CEE would be pleased to share these materials with EPA as input to the ENERGY STAR process.

## Connected Requirements

CEE has carefully considered the potential for "Connected" features to be incorporated within the ENERGY STAR program and has previously submitted comment letters addressing the considerations that merit additional analysis. We review several key points from those communications, below.

### **Capturing additional benefits is welcomed, if the core ENERGY STAR tenets are protected**

CEE stands committed to assist in responsibly supporting the incorporation of "Connected" functionality into the Program. We look forward to working with EPA to protect the meaning of ENERGY STAR and, through a carefully considered process, pursuing how additional value might be brought to bear in the Program. We appreciate that a step-wise process on a product-by-product basis is warranted given the significant stakes at hand. We support getting the considerations right rather than risking damage to the Brand.

### **With Current Ambiguity, Specification of "Connected" Features is Premature**

Because ENERGY STAR is a consumer brand that employs a binary labeling strategy—and the value proposition of "Connected" functionality to consumers is neither precisely defined nor understood—it is problematic to integrate such requirements with ENERGY STAR at this time. When "Connected" functionality can be precisely defined for consumer benefit, and the benefits independently verified, we would support incorporation along the lines of how maximum mercury levels were incorporated for compact fluorescent lighting and water factor was incorporated for clothes washers and dishwashers.

**We strongly support EPA's stated intention to focus on "Connected" features that will yield direct benefits to consumers.**

CEE agrees that if EPA's pool pump specification is to recognize "Connected" products, that it must start with identification of features that will directly benefit consumers, including new energy efficiency services that may be enabled. However, this recognition requires satisfying at least two currently unfulfilled conditions:

- Discussion and agreement among manufacturers, energy efficiency stakeholders, and other interested parties (e.g., demand response program administrators) on the value proposition—and specification requirements—of including connected features in the pool pump specification
- A mechanism to verify that connected features deliver the claimed benefit. Ideally this would be achieved through an industry-wide accepted test procedure. However, if EPA is to rely on market forces to ensure the quality of consumer-facing "Connected" features, we recommend requiring a manufacturer advertised claim that addresses the consumer benefits realized by the specified "Connected" features.

Importantly, we anticipate that once the consumer-facing benefits of connected pool pumps are specified, these features may also pave the way for other societal benefits (e.g., grid reliability, grid efficiency) to be realized.

**Consultation with brand management experts will inform our collective assessment of whether and how to expand ENERGY STAR to address "Connected."**

As currently proposed, expansion into "Connected" functionality could jeopardize the future success of the ENERGY STAR brand by violating at least three of the following tenets identified in a 2007 Interbrand report:

1. Technology must be proven, impeccable, and predictable
2. Benefits must be reasonably immediate and measurable
3. Outcomes must contribute to carbon reduction
4. Opportunities must be easy to access and simple to manage

We are concerned that current consumer expectations surrounding the "smart grid" banner extend well beyond that which can be specified (or managed) within the current limits of the binary labeling strategy that the ENERGY STAR Program employs. At the point when consumer benefits can be specified as noted above, we would then advise that a brand expert (e.g., Interbrand) be consulted on how to best integrate "Connected" functionality under the ENERGY STAR Program. We would not anticipate any changes to the label or retail point of sale materials that would compete with the fundamental, binary labeling strategy of the Program. If such an approach is to be considered, we would recommend that all stakeholders to the Program be consulted as this would seem to represent a fundamental change in the Program with significant implication going forward.

Thank you for your consideration of these comments. Please contact CEE Program Manager Eileen Eaton at (617) 337-9263 with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski".

Ed Wisniewski

Executive Director