



NRDC Comments on EPA ENERGY STAR's Final Draft Version 5.0 Specification for Residential Refrigerators

April 12, 2013

On behalf of the Natural Resources Defense Council (NRDC) and its more than 1.3 million members and online activists we respectfully submit the following comments on the EPA ENERGY STAR's Final Draft Version 5.0 Specification for Residential Refrigerators.

NRDC continues to urge EPA to set an earlier effective date for the Version 5.0 specification. As NRDC commented on the Draft 3 specification, NRDC recommends an effective date of January 1, 2014 or earlier and urges EPA to reconsider its decision for an effective date of March, 2014. As submitted previously, the market share for ENERGY STAR refrigerators was close to 55 percent in 2011 and was likely higher in 2012. Delaying the effective date for a full year will deprive consumers of energy savings that could be achieved with the revised ENERGY STAR specification. The high market share of ENERGY STAR refrigerators also weakens the value of the ENERGY STAR label to consumers.

EPA should carefully monitor market share data and consider a future specification revision. Given the current high market share and long time frame between specification updates, NRDC urges EPA to carefully monitor the market share of ENERGY STAR refrigerators as the Version 5.0 specification goes into effect and to initiate a future specification revision as warranted.

NRDC continues to strongly support the inclusion of a five percent energy credit for connected refrigerators, but shares concerns expressed in previous stakeholder comments that cloud-based interfaces alone are not sufficient to realize the benefits from connected appliances. NRDC continues to strongly support the inclusion of a five percent energy credit for smart-grid enabled refrigerator freezers. NRDC supports the comments submitted previously by the Consortium for Energy Efficiency that EPA require open standards at the appliance and that a cloud-based system alone should not be sufficient to qualify as connected. Ensuring that connected refrigerator freezers can be utilized in demand response and other utility-sponsored programs is critical to realizing the energy benefits of smart-grid enabled appliances. Requiring an open-standard that may allow any device or service-provider to communicate directly with the appliance will facilitate participation in these programs.

Thank you for the opportunity to submit these comments.

Sincerely,



Meg Waltner
Manager, Building Energy Policy