

June 17, 2011

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

Dear Ms. Stevens:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR Room Air Conditioners Draft 2 Version 3.0 Specification, released by the Environmental Protection Agency (EPA) on May 17, 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 U.S. states and 8 Canadian provinces. In 2010, CEE members directed over \$7.5 billion of energy efficiency program budgets in the two countries. In short, CEE represents the groups that are actively working to make ENERGY STAR the relevant 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 would like to thank EPA for the opportunity to provide comments on this specification revision.

## Filter Reminder

While CEE recognizes the energy savings potential associated with timely maintenance of filters, we reserve judgment on whether the suggested measure (a filter reminder) necessarily contributes to the desired end. As we understand the opportunity, the realization of energy savings requires a change in consumer practice. We appreciate the plausibility of a reminder contributing to the desired end; however, to what extent, coupled with what other actions and at

what known and unforeseen cost. When this complete case can be presented along with additional specificity in the definition of “filter” we welcome the opportunity to offer additional perspective.

## Energy Saver Mode

CEE supports the concept of having the “Energy Saver Mode” be the default operating mode, as long as EPA demonstrates that the “Energy Saver Mode” still provides adequate amenity.

## Smart Grid Compatibility

As a general matter, CEE supports the considered identification of potential benefits associated with a “smart grid” and welcomes the opportunity to assess the various representations of consumer value versus associated program risk, consumer cost and program administrator objectives once these representations can be assessed as actual. Until such time, it is impossible to make an informed judgment as to whether potential down side risks to the integrity of the Program are worth the upside potential that we all hope to see realized. Therefore, we recommend deferring such criteria until the necessary data and considerations can be discussed.

We echo EPA’s expressed need for further input on the functionalities of interest, consumer benefit associated with specific functionalities, how such benefits should be measured and verified, and the price differential for products with such functionalities. In an effort to address these outstanding information needs, CEE plans to work with the energy efficiency program community over the course of the coming year along with EPA and industry stakeholders to clarify expectations of potential value, costs and other relevant details associated with smart grid enabled efficiency opportunities. In the interim, CEE believes it is premature to start identifying “smart grid capable” room air conditioners, let alone allocating a 5% adder for compliant models. This includes recognizing or identifying in anyway “smart grid capable” products under the aegis of the ENERGY STAR Program.

In closing, CEE is committed to help assess the relative trade offs of incorporating “smart grid” considerations into the Program when these are readily defined and implications can be confidently assessed and understood. We would welcome the opportunity to work with EPA and all stakeholders at that point.

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 black ink that reads "Marc J. Hoffman". The signature is written in a cursive, flowing style.

Marc Hoffman

Executive Director