

March 14, 2012

Verena Radulovic
ENERGY STAR® Program
U.S. Environmental Protection Agency
Washington, DC 20036

Dear Ms. Radulovic:

Consortium for Energy Efficiency (CEE) is pleased to have the opportunity to provide comments on the *Draft 2 Version 6.0 ENERGY STAR Televisions Specification* dated February 3, 2012. CEE is the binational organization of energy efficiency program administrators 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. CEE members are strong supporters of the ENERGY STAR® Program and value EPA efforts to maintain the relevance of the ENERGY STAR specification for televisions in a fast moving market.

Test Procedure

CEE appreciates the EPA development of a test procedure for televisions that accurately measures energy consumption by simulating actual viewing conditions. However, CEE would like to understand EPA's rationale for adopting the still evolving DOE test procedure, rather than employing the existing ENERGY STAR test procedure, or another industry-recognized test procedure that is already in final form.

In order for test procedures used in ENERGY STAR specifications to be of value to energy efficiency program administrators, we submit they must address the following two needs of the efficiency community:

- **Credibility with Stakeholders:** Test procedures must be broadly supported by stakeholders such as industry and efficiency programs as a result of having been developed through a stakeholder vetting process; and
- **Sufficient Data for Analysis and Identifying Qualified Products:** The use of the test procedures will result in data sets that can be used reliably to set ENERGY STAR performance requirements, measure energy savings, and enable promotion of high efficiency products.

The CEE assessment is that, by referencing an incomplete test procedure, these needs are not being met. Without the benefit of a full vetting process, it is unclear whether the draft DOE test procedure set forth in the DOE January Notice of Proposed Rulemaking will receive broad support from industry and efficiency stakeholders, or even whether it will be adopted by DOE in its current form. It is also unclear whether the EPA data set is yielding accurate results, given the use of a correction factor. As we note below, questions raised by manufacturers during the February 15 stakeholder webinar suggest that further work is required on both the test procedure and the correction factor before either can be viewed as having achieved broad stakeholder support.

Qualification Criteria

Data set and qualification rate

CEE appreciates EPA efforts to build a data set that is as representative as possible of current television models. The proposed On Mode requirements and resulting qualification level of 15 percent of models appears to represent an appropriately selective differentiation of efficient models. However, CEE recommends that prior to finalization of the specification requirements, EPA should account for all 2012 models introduced since the data set was originally constituted, and then reexamine whether the qualification rate has significantly increased above the 15 percent level. If the addition of the new 2012 models significantly increases the number of models that qualify, we suggest that it might argue for tightening the criteria.

CEE staff and members who attended the 2012 International Consumer Electronics Show noted the prominent display of televisions with screen sizes of 60 diagonal inches and larger. As a result, they are working to understand the implications of this for the ENERGY STAR Program and for the efforts of voluntary efficiency programs to capture savings through the promotion of efficient televisions. To assist with its work to develop this understanding, CEE would like to understand the EPA rationale for changing the On Mode qualification criteria from the energy use “cap” approach employed in Version 5 to the hyperbolic equation in Version 6. CEE would also appreciate access to any information, such as forecast data, EPA has amassed on the expected prevalence of these larger televisions to allow CEE members to better assess the implications for savings resulting from the Version 6 On Mode qualification criteria.

Automatic Brightness Control

CEE supports EPA’s general objective of recognizing demonstrated energy saving technologies. However, we would like to better understand how EPA assumptions in developing the criteria that are related to automatic brightness control (ABC) impact expected savings calculations. For example, during the February 15 stakeholders’ webinar, participants noted that ABC may be subject to disabling in the event of consumer dissatisfaction with its performance. Another webinar participant pointed out that the weighting of the four illumination levels in the ABC correction factor may not accurately reflect actual viewing conditions. CEE therefore respectfully

requests that EPA provide stakeholders with additional information on its assumptions and any impacts on energy savings that may relate to Automatic Brightness Control functionality.

Definitions and Scope

CEE understands that some new televisions, such as 2012 SmartTVs from Samsung, when paired with certain subscription services, can provide the functionality of a set-top box without the need for a set-top box itself. Accordingly, we would ask EPA to clarify whether these products are included within the scope of the subject specification, fall within another specification, or whether they merit differentiation as a separate product category within the ENERGY STAR family. CEE recognizes the energy savings potential of these products, and thus their ability to qualify for an appropriate ENERGY STAR label would strengthen efficiency programs' ability to promote them.

Thank you for your consideration of these comments. CEE supports the objectives of the ENERGY STAR Program and appreciates the opportunity to work with EPA and program stakeholders. Please contact CEE Senior Program Manager Margie Lynch at MLynch@cee1.org or 617-337-9277 with any questions.

Sincerely,



Ed Wisniewski
Executive Director