

June 11, 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 *Proposal for Addressing ABC in the Version 6.0 ENERGY STAR Televisions Specification* distributed on May 16, 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.

Although the proposal specifically relates to the calculation of On Mode Power for products with automatic brightness control (ABC) enabled by default, there are several related issues not specifically addressed in the proposal that CEE raised in its March 14 comments and believes are still relevant. CEE respectfully requests that these be addressed in the Draft Final specification.

CEE Cautions Against Referencing an Incomplete Test Procedure

CEE appreciates efforts by EPA and DOE to develop a test procedure for televisions that accurately measures energy consumption by simulating actual viewing conditions. However, CEE would like to understand the rationale for adopting a yet to be finalized DOE test procedure, rather than employing the existing ENERGY STAR test procedure, or another industry-recognized test procedure that is already in final form. Use of an unofficial or incomplete procedure would seem to introduce an unnecessary business risk and contribute to undue pressure to avoid test procedure enhancements. Use of the current test procedure would not prevent future use of a new procedure, once finalized.

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

- Credibility with Stakeholders: Test procedures must have broad support from industry and efficiency program stakeholders as a result of having been developed through a stakeholder vetting process; and
- Sufficient Data for Analysis and Identifying Qualified Products: Application of the test procedure must result in data sets that may be reliably used to set ENERGY STAR performance requirements, measure energy savings, and enable promotion of high efficiency products.

By referencing an incomplete test procedure, these needs are not 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 applying a correction factor to the EPA data set is yielding accurate energy consumption measurements for products where ABC is enabled by default.

Given the Rate of Market Change, Make Use of a Current Data Set for Determining Minimal Qualifying Performance Levels

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 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 screen size 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 in this area, 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, that EPA has amassed on the expected market prevalence of these larger televisions. This would allow CEE members to better assess the implications for savings resulting from the Version 6 On Mode qualification criteria.

The Power Allowance for Automatic Brightness Control Should Not Compromise Cost Effective Savings for Customers

In its proposal, EPA proposes to grant an additional power allowance (equal to 10 percent of the On Mode Power limit) to products that ship with ABC enabled by default. A power allowance may be acceptable if the fundamental performance level of ABC results in defensible, cost effective savings for consumers and the resulting level is meaningful and worthy of ENERGY STAR. We therefore ask that EPA share its basis for the 10 percent power allowance via an updated energy savings analysis.

Definitions and Scope

CEE notes that some new televisions—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 seek clarification as to whether products with this capability are included within the scope of the subject specification, whether they fall within another specification, or if 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 likely 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 Principal Program Manager Peter Mills at PMills@cee1.org or 617-337-9265 with any questions.

Sincerely,



Ed Wisniewski
Executive Director