

August 22nd, 2012
Via Electronic Mail



Ms. Verena Radulovic
United States Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Ave NW
Washington, DC 20460

Subject: Comments Regarding the ENERGY STAR Proposal for Addressing ABC

The following comments are submitted for the record with regard to the EPA's August 10th letter to stakeholders supplementing the Agency's July 11th, 2012 final draft of its Version 6.0 Specification for televisions. They are submitted on behalf of the Northwest Energy Efficiency Alliance.

The Northwest Energy Efficiency Alliance is a non-profit organization working to encourage the development and adoption of energy-efficient products and services. NEEA is supported by the region's electric utilities, public benefits administrators, state governments, public interest groups and efficiency industry representatives. This unique partnership has helped make the Northwest region a national leader in energy efficiency. NEEA has long been a strong supporter of the Energy Star program for a number of appliances, including televisions.

In its August 10th letter, EPA proposed to change how televisions equipped with Automatic Brightness Control (ABC) must be tested. Rather than providing a 10% power allowance for TVs shipped with ABC enabled, EPA has proposed to continue requiring testing at 0 and 300 lux room illuminance, with validation testing at three intermediate room illuminance levels. Until DOE finalizes its new test procedures, which are highly likely to require testing at multiple room illuminance levels, this is a reasonable interim compromise, with advantages for the program and manufacturers (fewer changes within a short period of time and marketplace confusion, e.g.).

NEEA strongly supports these interim provisions.

However, like NRDC, we highly recommend that EPA add one additional test to the proposed methodology – that at the completion of the ABC-enabled testing, the ABC feature be disabled and the standard 10-minute test clip be run to measure the power consumed with the ABC disabled. At present, there is no data on what happens to power consumption when a television viewer disables this feature. If power rises significantly, it may be important to revisit the test method to try to account for this potential additional energy use, and devise a way to provide an incentive for manufacturers to minimize power consumption in the ABC-disabled mode.

We thank EPA for the opportunity to comment on this important change to its proposed test methods, and we very much appreciate the Agency's responsiveness to stakeholder input. NEEA looks forward to continuing our work with the Energy Star program for televisions.



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