



NRDC Comments on EPA ENERGY STAR's Draft 3 Version 5.0 Specification for Residential Refrigerators

October 9, 2012

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 Draft 3 Version 5.0 Specification for Residential Refrigerators.

NRDC urges EPA to consider an earlier effective date for the Version 5.0 specification. NRDC is disappointed with EPA's proposal to abandon the March 2013 effective date proposed in Drafts 1 and 2 and instead delay the effective date until March 2014. As EPA indicates, overall market share of ENERGY STAR refrigerators was close to 55 percent in 2011 and is likely even higher in 2012. Delaying until March 2014 for the new specification to go into effect will both deprive consumers of energy savings from more efficient refrigerators and diminish the value of the ENERGY STAR label. Additionally, with this change, EPA would be abandoning its previous proposal to have a tiered specification (Version 5.0 and Version 6.0) which would have likely provided consumers further energy savings.

If EPA continues on its current proposed path of a single specification revision, we urge EPA to establish an effective date of January 1, 2014 or earlier. We understand that manufacturers have petitioned DOE to begin utilizing the revised test procedure in January 2014. Additionally, AHAM's comments on the Version 5.0 Draft 2 proposal indicated that they would be able to meet a Version 6.0 specification by January 1, 2014 if the specification were finalized by April 2013. This indicates that an effective date of January 1, 2014 for the Version 5.0 specification would be acceptable.

In their comments on the Draft 2 specification, AHAM expressed concerns on differences between the EnergyGuide label and the ENERGY STAR qualified product list. While we appreciate the desire to coordinate timing between the FTC label, use of the revised test procedure and the ENERGY STAR effective date for the sake of manufacturers, we do not think these dates need to align perfectly and given the high market share of ENERGY STAR refrigerators believe that an earlier effective date should be a higher priority. A consumer is unlikely to directly compare the ENERGY GUIDE labels to the value reported to ENERGY STAR for certification purposes and so this fact should not prevent EPA from using the revised test procedure sooner than the ENERGY GUIDE label has been revised.

Finally, we note that EPA could set an effective date even sooner than January 1, 2014, either using the updated test procedure or using the current test procedure, with a

crosswalk once manufacturers start using the revised test procedure in 2014. While manufacturers raised concerns over the crosswalk for the Draft 2 specification, many of these concerns had to do with the use of the parabolic equation. Since EPA has abandoned the parabolic approach, creating a crosswalk for the specification between the current and revised test procedure should be simpler.

NRDC recommends that EPA strengthen the Version 5.0 Draft 3 criteria.

In the Draft 3 webinar, EPA estimated that 27 percent of ENERGY STAR qualified refrigerators in 2012 would qualify for the proposed Draft 3 criteria. Given that ENERGY STAR refrigerators already represent a large share of the overall market, this indicates that the refrigerators meeting the Draft 3 criteria also represent a large share of the overall market and that ENERGY STAR should strengthen the proposed criteria. For instance, if the market share of ENERGY STAR refrigerators has reached 75 percent or higher in 2012, refrigerators meeting the Draft 3 criteria would already account for about 20 percent of the market. We urge EPA to examine the overall market share data for 2012 once it is available and consider strengthening the proposed specification, in particular in light of the revised effective date.

Furthermore, while NRDC is fine with the move to a percent better than federal standard approach, we support EPA's previous proposal in Drafts 1 and 2 to have more stringent criteria for refrigerators that have greater overall energy use. To achieve this goal while maintaining the percent better than federal standard approach, EPA could adopt a maximum energy use cap for refrigerators over a certain size, as is currently done in the 2012 Most Efficient criteria for refrigerators. Alternatively, refrigerators above a certain size could be subject to a higher percentage improvement over the federal standard.

NRDC strongly supports the inclusion of a five percent energy credit for connected refrigerators. We agree with EPA's proposal to require that connected appliances be able to receive and respond to open standards-based signals from a utility or another 3rd party service provider. As noted in our comments on clothes washers and dryers, EPA should ensure that any additional energy use (standby or otherwise) added by connected features is captured in the test procedure and reflected in the specification.

Thank you for the opportunity to submit these comments.

Sincerely,



Meg Waltner
Energy Efficiency Advocate