

July 18, 2011

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

Dear Verena,

CEE appreciates the opportunity to provide comments on the Draft 1 Version 6.0 displays specification dated June 3 and test method dated June 29. 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 the majority of 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. The comments CEE submits today are informed by discussion in the CEE Consumer Electronics Committee.

CEE Supports On-Mode Power Criteria that Effectively Differentiate Efficient Products

CEE encourages EPA to propose On Mode power criteria in Draft 2 that provide effective market differentiation, which is fundamentally important to efficiency programs as they strive to identify and promote the most efficient models in the marketplace. CEE understands that EPA typically aims for 25% market penetration at the time a specification goes into effect. We support this goal both generally and in the context of the displays specification, as it is consistent with the brand tenets and makes ENERGY STAR useful for local efficiency programs by balancing differentiation in the marketplace against adequate product availability for promotion in voluntary incentive programs.

CEE is aware that EPA is using this phase of the comment process to collect a significant amount of data that would be relevant to determining On Mode criteria, including energy consumption data for displays of all sizes and data regarding the prevalence and energy consumption of product features such as internet connectivity, power management, and screen resolution. Since this data is essential to assessing proposed efficiency criteria, CEE requests that EPA share any quantitative (e.g., market penetration and reference data set) or qualitative data and reasoning that it has used as a basis for the On Mode criteria proposal in Draft 2.

The Specification and Test Procedure Should Be Informed by Differences Among Displays

CEE supports EPA's efforts to evaluate all types of displays for potential inclusion in this specification. As EPA has noted, display types could differ from each other in several significant ways. CEE encourages EPA to consider how these differences might be reflected in the ENERGY STAR qualifying criteria and test procedure so as to result in the submission of qualifying data for energy consumption that are as close as possible to real-world energy consumption. E.g.,:

- Should differences in typical hours of use per day affect the qualifying criteria?
 - For example, it is our general understanding that airport displays of flight information are on for long periods whereas home displays may be deactivated by computer power saving settings.
- How should the approach to automatic brightness control in the qualifying criteria and test procedure accommodate differences in ambient brightness that may exist between commercial and residential settings?

Data collected with accommodation for these differences among products are especially important for efficiency programs in their consideration of the savings potential for ratepayer-funded efficiency programs under regulatory scrutiny. Therefore, we request that EPA share any information it possesses with respect to these types of differences among products, and describe how that information has helped shape ENERGY STAR Displays Version 6?

Harmonization with Televisions Should Be Informed by Differences Between Televisions and Displays

EPA's specification cover letter, dated June 3, 2011, states that EPA intends for harmonization of display and television testing to simplify testing for manufacturers and product comparison for consumers. This intention seems reasonable. However, CEE has not had sufficient information to effectively evaluate any potential benefits and drawbacks of harmonization between the ENERGY STAR televisions and displays specifications.

As noted above, differences between televisions and displays, such as typical hours of use per day and ambient brightness, could be important considerations when harmonizing their specifications and test procedures to pursue testing results that approximate real-world energy consumption. Therefore, as EPA proposes harmonizing aspects of ENERGY STAR's approaches to these two product areas, CEE requests that EPA share any information and reasoning that is related to similarities and differences between televisions and displays and that has served a basis for EPA's proposal.

Potential Candidates for Scope of Included Products


CEE appreciates EPA's efforts to evaluate all types of products that may merit inclusion in the scope of the Version 6 specification. CEE respectfully requests that EPA consider whether wall-mounted displays capable of touch input (marketed as replacements for whiteboards), or interactive kiosks should be in scope. If EPA intends for the current scope to include them, we request clarification on which aspect of the scope incorporates them; if EPA has considered these but excluded them from the specification, we request that EPA share the basis for that determination; if EPA has not considered these, we recommend additional data collection to assess the appropriateness of their inclusion.

CEE Recommends Stakeholder Consultation on Criteria Regarding Non-Efficiency Characteristics

Consumer electronics energy efficiency program managers see potential value in ENERGY STAR requirements related to products' recyclability, toxicity, or greenhouse gas emissions in the manufacturing phase. For example, they may be effective secondary marketing messages for efficiency programs promoting the ENERGY STAR brand. CEE recommends that EPA consult with stakeholders at a Program-wide level regarding this topic. CEE would appreciate the opportunity to review any information EPA possesses or acquires through this stakeholder process regarding how any proposed restrictions on greenhouse gas emissions, recyclability, or toxicity are to be defined and how many products, if any, would cease to qualify due to any proposed restrictions.

Thank you again for the opportunity to comment. CEE strongly supports ENERGY STAR and we are eager to work with you to address the comments and questions raised in this letter. If you have any questions about these comments, please contact CEE Program Manager Seth Wylie at SWylie@ceel.org or 617-337-9288.

Sincerely,

A handwritten signature in black ink, reading "Marc J. Hoffman". The signature is written in a cursive style with a large, stylized "M" and "H".

Marc Hoffman
Executive Director