



Together We Can Change
National Markets

May 29, 2007

Richard Karney
ENERGY STAR Program Manager
US Department of Energy
1000 Independence Avenue SW EE2J
Washington, DC 20585

Dear Rich:

On behalf of CEE, I am submitting the following comments on the ENERGY STAR refrigerator criteria. These comments were developed by the CEE Residential Appliances Committee (Committee) in response to the draft of the ENERGY STAR Program Requirements for Residential Refrigerators and/or Freezers issued on April 27, 2007. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

ENERGY STAR Criteria

CEE supports DOE's proposal to increase the ENERGY STAR level for standard refrigerators to 20 percent above the current federal minimum standard based on DOE's market analysis. A level that is 20 percent above minimum standards will bring ENERGY STAR into alignment with CEE's current Tier 1 for all refrigerators. (The current ENERGY STAR level is below the CEE Tier 1 for mid- and full-size models.) A wide range of stakeholders, including energy efficiency programs and industry, have indicated their support for consistency between ENERGY STAR and CEE.

Although the availability of models at the 20 percent level is significantly lower than that at the current 15 percent level, DOE's research demonstrating that the 20 percent level is achievable using currently available technology leads us to believe that model availability at the 20 percent level will increase significantly. For the same reason, we expect to see more models at all the various sizes and configurations at the 20 percent level in the future in spite of some limited availability today.

We also support an April 1, 2008 effective date, which will provide a reasonable period of time for market players to adapt to the new level. Finally, we agree with DOE's proposal to keep the levels for compact refrigerators and freezers the same. Based on the market analysis, there does not appear to be compelling data to change these levels at this time.

In the next ENERGY STAR refrigerator criteria revision process, CEE suggests that DOE consider at least three additional changes to the criteria:

1. An annual kWh ceiling across all types of refrigerators
2. A more stringent efficiency requirement (measured as required percent improvement over the federal minimum standard) for the larger refrigerator classes
3. A revision to the refrigerator configuration categories used for ENERGY STAR qualification (i.e., ENERGY STAR now uses the categories outlined in the federal

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minimum standard, which results in different efficiency allowances for different configurations and sizes of products)

Each of these suggestions are potential mechanisms to mitigate the trend toward increased overall refrigerator energy consumption, due in part to the increase in refrigerator size and in the number of energy-consuming features some refrigerators have (e.g., televisions). These trends have limited the efficiency gains that have been made in recent years. When CEE next revisits our own refrigerator specification, we will be considering these changes, as well.

Test Criteria

CEE supports DOE's effort to address potential problems with the federal test procedure for refrigerators by modifying the requirements for products to qualify for ENERGY STAR (pages 1 and 3 of the Program Requirements) and by including language that addresses the intent of the test procedure (page 5 of the Program Requirements). We strongly suggest that the ENERGY STAR criteria also contain explicit language identifying the consequences of not complying with the intent of the test procedure (e.g., disqualification of the affected products from ENERGY STAR). With the addition of such language referring to consequences, we agree that DOE's approach is a good solution for the ENERGY STAR program.

Nonetheless, we continue to believe that DOE needs to reevaluate the refrigerator test procedure as soon as possible to ensure that it accurately reflects refrigerator energy use in real world conditions, as we articulated in our letter dated August 31, 2006. Again, we make this recommendation with the intent of protecting the integrity of not only the ENERGY STAR program, but also the federal EnergyGuide label, since the test procedure is used as a basis in both cases.

Thank you again for the opportunity to comment. The Committee looks forward to the release of the final criteria in the next few months. If you have any questions about these comments, please direct them to Erica Schroeder, CEE Program Associate at (617) 589-3949 ext. 231 or ESchroeder@CEE1.org.

Sincerely,



Marc Hoffman
Executive Director

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