



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF AIR AND RADIATION

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DOCKET	
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DATE	JUL 23 2009
RECD	NOV 16 2009

Dear Harinder,

Thank you for the opportunity to comment as part of the California Energy Commission's process to develop energy efficiency standards for televisions sold in California. EPA shares the CEC's interest in improving energy efficiency as a means to address global climate change as well as other issues. We recognize that televisions and other consumer electronics collectively present a meaningful savings opportunity. We also believe that voluntary and regulatory approaches can work hand in hand over time to improve the efficiency of products and would like to advise you on the status of the ENERGY STAR program efforts to promote efficient televisions.

As you know, the ENERGY STAR label is intended to make it easier for consumers to identify the most energy efficient products in the market. Accordingly, ENERGY STAR performance levels are established so that a relatively small percentage of product models (typically about 25%) can meet them when the specification goes into effect, given that the product performance is maintained at these higher efficiency levels and consumers are provided with an attractive payback if there is an initial price premium. This program model has delivered significant energy savings and environmental benefit across the country.

ENERGY STAR is distinctly different from standards. The role of standards is to eliminate the least efficient products, and they are mandatory as opposed to voluntary, thereby having a much larger impact on manufacturers and their business outlook when they go into effect. EPA believes that careful consideration should be paid in terms of whether and when to incorporate ENERGY STAR performance levels into minimum standards.

Specific to televisions, you may be aware that a new active mode ENERGY STAR specification for televisions goes into effect November 1, 2008. Based on our dataset, we believe that about 27% of products on the market now will meet these requirements. The overwhelming majority of the products likely to qualify will be LCD and rear projection televisions.

Under the new ENERGY STAR specification, TVs that carry the ENERGY STAR label will be as much as 30 percent more efficient than conventional models. In addition, we are committed to a prompt revision of our specification as the market moves but effective no later than September 2010.

Thank you for the opportunity to make these comments. I am happy to discuss this with you further and can be reached at (202) 343-9312.

Best regards,

A handwritten signature in black ink, appearing to read 'K. Hogan', with a stylized flourish extending to the right.

Kathleen Hogan, Director
U.S. Environmental Protection Agency
Climate Protection Partnerships Division