

Natural Resources Defense Council
Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy

May 12, 2017

Abigail Daken
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: ENERGY STAR® Draft 1 Version 4.0 Specifications for Ceiling Fans

Dear Ms. Daken,

The enclosed are the comments of the Natural Resources Defense Council, the Appliance Standards Awareness Project, and the American Council for an Energy-Efficient Economy, in response to the proposed revisions in the Draft 1 Version 4.0 ENERGY STAR Ceiling Fan Specification released on April 14, 2017. We appreciate the opportunity to comment.

We stand in strong support of the U.S. Environmental Protection Agency's (EPA) ENERGY STAR program and we support EPA's efforts to update the ENERGY STAR ceiling fan specification.

The ENERGY STAR program has a long history of identifying products with superior energy performance, which helps consumers and businesses save money and protect the environment. ENERGY STAR is one of the most widely recognized and well-trusted brands. Almost 85 percent of American households understand what the label means. Nearly half of all consumers purchased an ENERGY STAR labeled product in the past year.¹ Across the ENERGY STAR program, a \$50 million annual budget produces more than \$30 *billion* worth of annual consumer utility bill savings.

There has been an ENERGY STAR specification for ceiling fans since 2002. Given that the U.S. Department of Energy (DOE) recently finalized both an updated test procedure for ceiling fans, which takes fan airflow efficiency into account, and the first-ever performance-based standard for ceiling fans, we concur with EPA that the time is ripe for an update to the ENERGY STAR specification.

We support a new ENERGY STAR specification based on the performance of ceiling fans with brushless DC motors.

EPA proposes to base the new specification on the levels in the DOE Final Rule Technical Support Document for ceiling fans² that correspond to brushless direct current (DC) motor fans (Trial Standard Level 5). EPA found that approximately 18 percent of ceiling fans on the market

¹ https://www.energystar.gov/sites/default/files/asset/document/PowerOfTheBrand_2017.pdf

² <https://www.regulations.gov/document?D=EERE-2012-BT-STD-0045-0149>

today meet these proposed levels, which means that the ENERGY STAR label will provide true differentiation in efficiency even after the compliance date for the DOE ceiling fan standard in early 2020.

Including the Ceiling Fan Light Kit (CFLK) requirements within the body of the ENERGY STAR specification is sensible.

Rather than referencing the separate ENERGY STAR Luminaires Version 2.0 specification, EPA has incorporated the requirements of this specification into the proposed ceiling fan specification.

EPA provides options for lighting performance requirements for CFLKs shipping with ENERGY STAR certified light bulbs and for CFLKs with integrated solid-state lighting circuitry and separable light sources other than ENERGY STAR certified lamps. EPA also provides an option to comply by lumen maintenance requirements for CFLKs with integrated solid-state lighting circuitry and separable light sources other than ENERGY STAR certified lamps. These options are carried over either from the ENERGY STAR Luminaires Version 2.0 specification or the current ENERGY STAR ceiling fans requirements, with modifications to integrate the DOE test procedure and/or simplify how manufacturers use the specifications. We support incorporating these lighting-related specifications into the body of the ENERGY STAR ceiling fan specification, which will make the ENERGY STAR specification easier to use.

The minimum warranty requirements proposed by EPA for the motor and driver components will help to ensure customer satisfaction with ENERGY STAR ceiling fans.

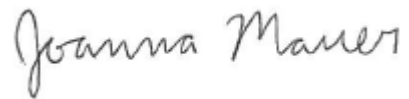
Consumers have come to expect that the ENERGY STAR brand signifies not only superior energy performance, but also excellent product quality. To maintain the high level of satisfaction with ENERGY STAR ceiling fans, we support minimum warranty requirements for both the motor and the driver. The fan cannot operate without its driver components, and it is difficult for a consumer to diagnose if the driver fails separately from the motor. We believe that the integrity of the ENERGY STAR brand is crucial to the continued success of the program and the warranty requirements help to ensure high customer satisfaction.

Thank you for considering these comments.

Sincerely,



Lauren Urbanek
Senior Energy Policy Advocate
Natural Resources Defense Council



Joanna Mauer
Technical Advocacy Manager
Appliance Standards Awareness Project



Jennifer Amann
Buildings Program Director
American Council for an Energy-Efficient Economy