

July 8, 2008

Samuel W. Bodman
Secretary
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Secretary Bodman,

We are writing to the Department of Energy (DOE) to express our strong support for withdrawal of the outdated DOE test method for measuring television “on mode” power consumption. In recent years, television technology has been evolving rapidly and energy use growing. Unfortunately, DOE’s TV energy use testing methodology has not kept pace. The current official DOE test method is now more than 30 years old. Created for analog cathode-ray tube (CRT) products, it relies on a black and white static test pattern. As such, it does not yield accurate results for modern digital televisions. Expeditious DOE withdrawal of the outdated test method will clear the path for meaningful energy performance testing and data disclosure or labeling.

Television energy consumption is growing.

According to research performed by the Natural Resources Defense Council (NRDC), televisions consume approximately 1% of national electricity use. TV energy use has been growing due to several factors: a) larger screen sizes; b) high definition content; and, c) increased hours of operation due to the increased range of content (e.g., 50 plus cable channels, DVD viewing, and video games played on the TV). In many households, the annual energy consumed by a big screen TV is equal to that of a new refrigerator (around 500 kWh/yr).

Energy use of similarly-sized TVs can vary widely. Based on recent data collected by the ENERGY STAR program and others per a new test method developed under the aegis of the International Electrotechnical Commission (IEC), “on mode” power use can vary by a factor of two or more. Providing consumers accurate data based on an up-to-date test method has the potential to yield large national energy savings.

The IEC’s updated consensus test method.

Moving images, rather than static ones, are needed to properly activate all the components used to process and deliver an image on the screen of a modern digital television. The TV manufacturers acknowledge the inadequacy of the current DOE test method and have worked diligently through the IEC to develop an up-to-date consensus test method (IEC 62087) that employs a set of standardized moving images that can be used on any TV technology (e.g., plasma, LCD, etc.) This new IEC test procedure has broad international support and is expected to be published in final form by year’s end. The new ENERGY STAR program for televisions, which becomes effective later this year, relies on the draft IEC test method to qualify products to carry the ENERGY STAR designation.

The outdated DOE test method is a barrier to accurate energy use information.

In today's market, consumers do not have access to model-specific annual energy use or operating cost information for new TVs. Manufacturers rarely include energy use data in their marketing or point-of-sale materials. Congress addressed this problem in Section 325 of the Energy Independence and Security Act of 2007 (EISA) which authorizes the Federal Trade Commission (FTC) to create energy use labels or alternate energy use disclosure requirements for new TVs. However, by law, FTC *must* use DOE test methods if "applicable testing procedures" exist. In the absence of a DOE test method, FTC may adopt other testing procedures. We are very concerned that lack of clear FTC authority to use a test method other than the 1970s era DOE method will result in serious delays in consumers getting access to accurate information on TV energy use.

Failure to enable accurate data disclosure of energy use will hobble efforts to save energy. For example, large scale buyers like retailers and hotels would like to be able to compare the efficiency performance of similarly-sized models. Wal-Mart has publicly stated their goal to reduce the energy use of new TVs by 30% by 2010 and will need accurate data to support this effort. Similarly, utility programs need accurate baseline performance data to structure consumer incentive programs to promote the more efficient models. Finally, individual consumers will benefit from information enabling them to compare product energy use.

DOE should withdraw the outdated test method.

The California Energy Commission (CEC) formally petitioned DOE on May 23rd to repeal the outdated test method. We support expeditious approval of that petition. Such action will clear the path for adoption of the up-to-date consensus IEC test method and for the FTC to establish meaningful universal energy use disclosure or labeling for TVs. We greatly appreciate your attention to this matter.

Sincerely,



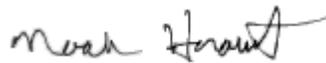
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President & CEO
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Gary Severson
SVP GM Entertainment, Wal-Mart



Seong Ohm
SR VP Segment Leader Technology &
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Noah Horowitz
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Natural Resources Defense Council



Roland Risser
Director, Customer Energy Efficiency
Pacific Gas & Electric Company



Mr. Wallace F. Tillman
Vice President
Energy Policy and General Counsel
National Rural Electric Cooperative
Association



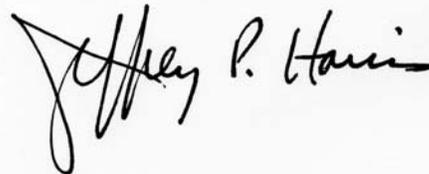
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Gregg D. Ander
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Isaac Elnecave
Efficiency Standards Project Manager
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Roger Cooper
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American Gas Association

cc: Mr. Alexander Karsner, Assistant Secretary for Energy Efficiency and Renewable
Energy, U.S. Department of Energy
Mr. David Rodgers, Deputy Assistant Secretary, Technology Development, U.S.
Department of Energy
Mr. William Staack, Senior Staff Attorney, California Energy Commission