



NRDC Comments on EPA's August 10, 2012 Update on the Proposed Energy Star Version 6 Specification for Televisions

Submitted By:

Noah Horowitz
Senior Scientist
NRDC
nhorowitz@nrdc.org

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On behalf of the Natural Resources Defense Council and our more than 1.3 million members and electronic activists, we respectfully submit comments on the EPA's August 10th letter to stakeholders that supplemented the agency's July 11, 2012 final draft Version 6.0 specification for TVs.

In its recent letter, ENERGY STAR changed how TVs that have an Automatic Brightness Control (ABC) feature shall be tested. In short, ENERGY STAR has decided to move away from their initial plan of providing TVs that are shipped with ABC enabled with a 10% power "allowance" and instead to continue their current methodology of testing TVs with ABC at two room lighting conditions, 0 and 300 lux, that represent extreme conditions – pitch black and extremely bright.

To help minimize some of the gaming that is currently occurring, ENERGY STAR is requiring on mode power testing be done at four test points (0, 10, 50, 100 and 300 lux) for TVs that are shipped with ABC enabled. In addition EPA has strengthened its ABC Sensor Validation Testing requirement which provides a check to ensure that TV power use does indeed scale with ambient lighting levels, which we strongly support.

NRDC believes EPA has produced a reasonable compromise for addressing ABC until DOE establishes a national test method for measuring TV power use.

Getting the ABC issue right is very important as the power use of TVs with ABC enabled can be 10 to 20% or more lower than those without ABC. Much of these savings will be lost if the user is not satisfied with how the ABC is functioning and there is very little data on what % of users disable ABC or how much power a TV with ABC will use when the ABC feature is disabled.

As such we recommend ENERGY STAR add one minor change to its specification before finalizing. The final specification should include a requirement that TVs shipped with ABC enabled also measure and report the power use of the TV after ABC is

disabled. In other words, upon completing the power measurements at the various lux levels, the tester would then disable the ABC feature, run the standard 10 minute test clip and report the average power consumed. This data will prove very valuable for the DOE test method process and for development of subsequent versions of the ENERGY STAR TV specification.

We believe this test will not place a burden on manufacturers as no screen brightness or ambient light level measurements will be required. In addition, this data will provide for the first time real data on what happens when ABC is disabled. For example, will the TV then revert back to the standard/home setting or to some significantly more consumptive power level?