

Duplicative and Overlapping Federal Resources Due to ENERGY STAR Being Administered by EPA instead of DOE for Home Appliances

Function	EPA	DOE	Redundancy or Conflict
Information Collection	Through Certification Bodies	Through CCMS	Different information collected and/or same information collected twice for the same product
Database	Qualified Products List (QPL)	CCMS	Same products listed on two separate Federal databases
Certification	QPL	CCMS	Two separate certifications to the Federal government required for the same product
Verification	Third party certification bodies do verification tests, EPA makes enforcement decisions, sometimes in consultation with DOE	DOE Supports technical aspects of enforcement decisions for ESTAR; makes enforcement decisions for appliance standards program	Both EPA and DOE working on enforcement
Consultants	ICF	Navigant	Federal government wasting resources developing the same expertise on the same products at two different consultants
Definitions	Specifications	Rulemaking; 10 CFR 430	DOE already has definitions, but EPA relitigates
Product Coverage	Specifications	Rulemaking; 10 CFR 430	DOE already defines covered products, but EPA relitigates
Product Class Determinations	Specifications	Rulemaking; 10 CFR 430	DOE already defines product classes, but EPA relitigates
Analysis	Model counts; No examination of incremental costs to reach proposed criteria; Sometimes uses	Thorough analysis in Technical Support Documents and proposed and final rules	Different analysis to examine energy savings potential and viability of levels

	DOE's technical documents, but not always		
Test Procedure	Cites to DOE test procedure; sometimes requires additional tests	Rulemaking; 10 CFR 430	DOE sets test procedures, but EPA sometimes adds to them (e.g., drying time requirement)
Effective Dates	Specifications	Final Rules, based on EPCA	DOE sets effective dates, but EPA relitigates
Performance	Believes should be performance minimums	Develops tests for performance assessment at request of EPA for ENERGY STAR; For appliance standards, evaluates performance during the standards setting process	Federal government has two different fundamental approaches to evaluating the intersection between stringency of energy requirements and product performance