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December 4, 2009

Ms. Katharine Kaplan, EPA
Energy Star Program

Katharine:

Thank you for the opportunity to respond to Draft 1 Version 2.0 of the Energy Star[®] Program requirements for Programmable Thermostats – Tier 1. Lux Products Corp. agrees that programmable thermostats should help deliver energy savings from the hvac equipment they control, be easy to use and be manufactured with reduced toxic substances.

We feel that the proposed “HAN communication capability” is premature and adds undue cost to the end user that lives in an area where such utility infrastructures don’t exist. Since the controls industry has not embraced a protocol accepted by all manufacturers, I suggest that this requirement be put in abeyance.

We also take exception to requiring multiple program modes when only one will be used. Tremendous additional cost is incurred with the requirement for 3 heat/2 cool conventional/heat pump product for Energy Star compliance. Most condensing units and heat pumps installed employ single-stage compressors. There is no reason why discrete 1 or 2 stage heat/1 stage cool conventional or heat pump couldn’t be deemed Energy Star quality.

The requirement for outside sensors for all ES thermostats seems superfluous for non-heatpump or dual fuel systems.

As I recall, the main reason for sunseting the existing Energy Star requirements was because DOE could not accurately quantify energy savings using programmable thermostats. Previous independent studies pointed to the fact that end users did not necessarily use programmable thermostats in the program modes. I do not see anything in the proposed program requirements that will change this. I see too many proposed requirements that might dissuade the end user from opting for an Energy Star compliant programmable thermostat because of cost when it is up to them to make a choice. Manufacturers of modern programmable thermostats have realized that ease of programmability, display size and readability and affordability are marketing criteria for

which we all strive to achieve, some better than others. These criteria are also very subjective and should be left to the manufacturer to decide.

Respectfully,

(signed) Steve Millheiser