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The Attachments Energy Rating Council's Response to the ENERGY STAR Specification for Smart Home Energy Management Systems Draft 1 Version 1.0

The Attachments Energy Rating Council (AERC) appreciates the opportunity to comment on the ENERGY STAR Specification for Smart Home Energy Management Systems (SHEMS) Draft 1 Version 1.0. AERC was created through a cooperative agreement with the U.S. Department of Energy to rate, certify, and label the energy performance of window attachments. Based on technological and industry developments in recent years, AERC is expanding its residential certification program scope to include automated window attachments.

AERC supports the development of an ENERGY STAR program for SHEMS and endorses the direction of Draft 1. AERC appreciates that EPA is recognizing the value of "smart home" technologies for energy efficiency through this new specification. EPA's reference to automated window attachments certified through AERC's truth-in-labeling program in Section 4.3C (Optional Encouraged Devices) enables ENERGY STAR Partners to provide SHEMS that include automated window attachments as part of the package to generate energy savings. Window attachments represent a significant energy savings opportunity in U.S. homes, and automation is a strategy to improve the likelihood and scale of energy savings.

Optional Encouraged Devices: Terminology

AERC includes a variety of product types in its certification. To avoid Partner and consumer confusion about what product types can count toward the SHEMS package, AERC recommends that EPA adopt the term, "window attachments" rather than using "window coverings" in line 278 of the draft specification. The term, "window coverings" typically connotes interior products such as blinds, shades, drapes, and others; whereas "window attachments" encompasses those products in addition to roller shutters, awnings, and other exterior products. AERC recognizes the energy performance of both interior and exterior product types.

In conclusion, AERC strongly supports the development of an ENERGY STAR SHEMS program, appreciates the opportunity to comment on the ENERGY STAR Specification for SHEMS Draft 1 Version 1.0 document, and looks forward to the release of the next draft.

Sincerely,

Ralph Vasami
AERC Executive Director