
From: Adam Shick <adam.shick@energytrust.org>
Sent: Monday, July 14, 2014 12:43 PM
To: 'climatecontrols@energystar.gov'
Subject: written comments on climate controls proposal

To whom it may concern,

I would like to provide two comments for *Key Question #3 for Stakeholders; Are there issues with submitting periodic data?* My comments have to do primarily with the possibility of fraud.

I have a concern that product rankings based on “in the field” energy savings are potentially problematic, since energy savings in the field depend on the implementation strategy of a climate controls program. It is then possible that a large poorly implemented program could decrease the relative ranking of a given project, while a large well implemented program could improve a products ranking, while there is no underlying change in the actual product itself. Competitors could possibly ‘cheat’ this system to gain an advantage.

My second concern is that if the manufacturers of these products are the ones submitting the summarized data for their products, then who is making sure they are submitting representative data, rather than just hand-picked winners? There is a lot of money at stake in this market, which implies that there are large incentives for manufacturers to cheat this system...

Thank you,

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