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Hunter Douglas Window Fashion Division's Response to the ENERGY STAR Specification for Smart Home Energy Management Systems Draft 1 Version 1

Hunter Douglas appreciates the opportunity to comment on the ENERGY STAR Specification for Smart Home Energy Management Systems (SHEMS) Draft 1 Version 1.0 in relation to the inclusion of window attachments.

Hunter Douglas supports the development of an ENERGY STAR program for SHEMS and endorses the direction of Draft 1 and is excited 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 the Attachments Energy Rating Council's (AERC) 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.

Home energy performance has always been at the forefront of development for Hunter Douglas. In 1985, Hunter Douglas commercialized the first Honeycomb (cellular) shade developed with the support of a DOE grant as an answer to the energy crisis. We have continued to innovate in this space with our most recently introduced cellular roller product.

The development of automated products and partnerships with whole home automation systems firms and home integrators is a key strategy for Hunter Douglas. Our continuing sales growth of automated window coverings is a strong indicator that consumers are willing to invest in smart home energy management systems providing efficiency and automated control.

Hunter Douglas has been an active AERC member since its inception and is currently certifying our most energy efficient products. Based on technological and industry developments in recent years, AERC is expanding its residential certification program scope to include automated window attachments. Hunter Douglas has strongly encouraged this expansion to include automated window attachments.

As stated previously, Hunter Douglas strongly supports the development of an ENERGY STAR SHEMS program, and the opportunity to comment on the ENERGY STAR Specification for SHEMS Draft 1 Version 1.0 document. Our team is available to discuss any aspects of the automated window attachments concept. Hunter Douglas looks forward to the release of the next draft.

Sincerely,

Doug Barr
President
Hunter Douglas
Window Fashions Division