



July 15, 2019
Via Electronic Mail

U.S. Environmental Protection Agency Office of Air and Radiation
1200 Pennsylvania Avenue NW
Washington, D.C. 20460
RoomAirCleaners@energystar.gov

Subject: ENERGY STAR® Room Air Cleaners Version 2.0 Limited Topic Proposal – Connected Criteria

Dear Ms. Kaplan,

This letter is submitted on behalf of the Northwest Energy Efficiency Alliance (NEEA) and the Pacific Gas & Electric Company (PG&E) in response to the request for comments on the Room Air Cleaners Version 2.0 Limited Topic Proposal – Connected Criteria. NEEA is a non-profit organization representing an alliance of more than 140 Northwest utilities and energy efficiency organizations working on behalf of more than 13 million energy consumers. PG&E is an investor-owned utility, focused on providing safe, reliable, clean and affordable energy to 16 million Californians. These organizations encourage the development and adoption of energy-efficient and grid flexible products and services.

We strongly support EPA's ENERGY STAR® program. ENERGY STAR is a critically important federal program created with bi-partisan support that annually delivers billions of dollars of energy savings to consumers and business. As such, ENERGY STAR's leadership in setting appropriate product specifications plays a critical role in advancing the efficiency of consumer products by recognizing those products that meet consumers' experiential expectations as well as save them energy and money.

NEEA and PG&E are pleased to see that ENERGY STAR has proposed connected criteria for the air cleaners product specification revision. In our previous letter in response to the Version 2.0 Draft 1 Specification, we expressed support for including a reporting field to note if a product is network connected. Having knowledge of how many products have a connected functionality will help future determinations of the savings potential for demand response programs. Products with open access and energy consumption reporting have the potential to play a large role in Smart Home Energy Management Systems as well as contribute to grid flexibility in the future.

We thank EPA for developing connected criteria for this product category and publishing for stakeholder input. We support the direction of this specification and look forward to future publication.

Sincerely,



Nick Leritz

Senior Product Manager

Northwest Energy Efficiency Alliance



Tim Michel

Customer Energy Solutions

National Strategic Partnership Manager

Pacific Gas and Electric Company