



## KYLE PITSOR

Vice President, Government Relations

December 19, 2016

VIA EMAIL TO: [ConnectedThermostats@energystar.gov](mailto:ConnectedThermostats@energystar.gov)

Ms. Abigail Daken  
U.S. Environmental Protection Agency  
ENERGY STAR Climate Protection Partnerships Division  
Office of Air and Radiation  
Washington, DC 20460

### **NEMA Comments on Draft ENERGY STAR® Program Specification for Connected Thermostats, Final Draft**

Dear Ms. Dakin,

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide comments on the subject proposal. These comments are submitted on behalf of NEMA Residential and Commercial Controls Section companies.

NEMA, founded in 1926 and headquartered in Arlington, Virginia, represents nearly 400 electrical and medical imaging manufacturers. Our combined industries account for more than 400,000 American jobs and more than 7,000 facilities across the U.S. Domestic production exceeds \$117 billion per year.

NEMA and its members who make climate control systems and thermostats appreciate the years of investment and investigation made by EPA following the sunset of the ENERGY STAR thermostat program in 2009. Despite our previous comments of July 2015<sup>1</sup>, sent on behalf of manufacturers that produce and supply nearly 90% of the thermostat market, ENERGY STAR continues to espouse an approach that requires significant investment by the manufacturer/partner to gather, report and verify data for energy savings analysis, with no readily apparent benefit to manufacturers or consumers guaranteed in return.

Consumers concerned about home energy have multiple options available to them today to install a readily available programmable thermostat or smart thermostat and enjoy energy savings without the added cost or inconvenience of needing a professionally installed connected ENERGY STAR product. NEMA members and their customers continue to have significant concerns with the ability to protect consumer's private use data that would be gathered by EPA's proposed product.

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<http://www.nema.org/Policy/Documents/NEMA%20Comments%20to%20EPA%20Connected%20Thermostats%20Draft%201%2027July2015%20Final.pdf>

Because of the unproven benefits and complex nature of the proposed program, NEMA recommends that EPA abandon the program being proposed and work with industry to promote consumer education and awareness of using programmable and smart thermostats.

If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or [alex.boesenberg@nema.org](mailto:alex.boesenberg@nema.org).

Sincerely,

A handwritten signature in black ink that reads "Kyle Pitsor". The signature is written in a cursive, flowing style.

Kyle Pitsor  
Vice President, Government Relations