

ENERGY STAR Connected Thermostat Demand Response Stakeholder Comments		
Topic	Comment Summary	Draft EPA Responses
Connected Thermostats Program	Three stakeholders enthusiastically supported the U.S. Environmental Protection Agency's (EPA's) effort to establish an ENERGY STAR connected thermostat program and appreciate the opportunity to be involved in the development.	EPA appreciates this feedback.
Definitions	One stakeholder suggested adding some clarity to distinguish between a utility and a company that performs the functions of an "aggregator" to utilities so that the path of DR services is better defined. Another stakeholder asked EPA to consider adopting the Federal Energy Regulatory Commission definition of demand response. This stakeholder also suggested EPA redefine Demand Response Management System (DRMS) as the system operated by a program administrator (such as the utility or third party) and refer to program administrator as the entities who operate the demand response programs.	EPA appreciates these comments and has adopted the FERC DR definition as well as added a definition for DRMS.
Open Standards Criteria	One stakeholder highlighted the importance of customers having the ability to participate in DR programs and to remotely manage their CT; even if the CT manufacturer goes out of business. Another stakeholder voiced the need for communication protocols to be standardized and managed by an ISO-recognized standards organization (such as IEC, ANSI, IEEE, etc.), rather than depending on vendor-defined APIs. Two stakeholders commented on the need for the CT device to use open standards based communications to maximize the products' potential for consumer and grid value.	Thank you for your support. EPA has retained the open standards/open access criteria in Draft 2.
Demand Response	One stakeholder commented that CT Service Providers that are DR aggregators be subject to separate, high-level and flexible DR criteria. Another stakeholder commented that in the case a CT is certified to Title 24; it should be considered to comply with the ENERGY STAR DR criteria	In consideration of the broad variety of robust business models among CT service providers, including for DR, EPA has elected to propose much broader DR criteria in Draft 2. These criteria retain open standards/open access requirements - for which test labs may leverage applicable existing product certifications - and retain a consumer override requirement, but drops detailed DR requirements.
Demand Response	A number of stakeholders raised the following specific concerns and suggestions: <ul style="list-style-type: none"> • Rather than establishing the maximum and minimum of 50/85 degrees F, the program should allow each customer to establish their own maximum and minimum temperatures. Customers will have more energy savings if the maximum is higher than 85 degrees F. • Create a demand response that can be customized because utility demand response programs significantly vary across the country and criteria. • Allow the utility and consumer to control how much their thermostat responds. • Establish a shorter response duration which would be more convenient for the consumer. • Modify the default Type 1 and Type 2 response setting to include a heating response, regardless of the type of heating used in the building. • Extend Type 2 fast cycle to more than a 10 minute response time. • Allow for multiple offset levels rather than one of just 4 degrees. • Allow offsets in either direction for both heating and cooling. • The demand response program administrator should establish the number of possible events per any time period, cycle rates, degree of temperature offsets, and other parameters. • Consider the major investment implementers need to make in order to integrate ENERGY STAR connected thermostats into a demand response program. 	EPA thanks stakeholders for these comments and notes that under the broad and flexible DR approach proposed in the Draft 2 specification; ENERGY STAR CT partners will be empowered to develop DR capable CT products and services that implement these suggestions and fulfill both utility needs and consumer expectations.