

December 19, 2016

Ms. Abigail Daken  
US Environmental Protection Agency  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. Daken:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the *ENERGY STAR® Version 1.0 Final Draft Connected Thermostats Specification* (Thermostats Specification), released by the Environmental Protection Agency (EPA) on December 2, 2016.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 46 US states, the District of Columbia, and seven Canadian provinces. In 2014, CEE members directed over \$6.8 billion of the \$8.7 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

## **Expand Efforts to Educate Partners on the Credibility of EPA's Method to Demonstrate Field Savings**

We support EPA's ongoing pursuit of identifying connected thermostats that will yield consistent energy savings; however, the method for determining energy savings requires greater vetting and in-field experience in order to enable the use of ENERGY STAR for this category of products. Achieving energy savings from connected thermostats is highly dependent on human behavior in the field; collecting and sharing field data would therefore bolster the confidence of ENERGY

STAR Partners and their regulators that benefits are achieved. Particular opportunities have been identified by the California IOUs in their recent comments on the *ENERGY STAR Connected Thermostats Final Draft Method to Demonstrate Field Savings* that are representative of the type of data that CEE believes would prove useful. Ultimately the ENERGY STAR Program will be best served if all manufacturers using the ENERGY STAR logo provide a clear representation for how savings are achieved by the customer, and provide data over time that justifies that claim.

## **Clarify How Currently Allowed Variation within a Single Product Family Will Ensure Energy Savings**

In general, we encourage EPA to expose to Partners the diligence behind specified requirements, and clarify ENERGY STAR's strategies for mitigating risk to the Program. CEE appreciates that EPA has provided details regarding the test requirements for product families in the final draft specification that explicitly state connected thermostat products using different savings strategies shall be in different product families. However, the Final Draft Eligibility Criteria does not otherwise limit how broadly a connected thermostat service provider could define a connected thermostat product family. We are concerned a connected thermostat service provider could potentially qualify a product with insufficient savings by aggregating it with products that achieve higher savings using a similar savings strategy.

Specifically, it is not clear whether the fourth example (line 305) would allow products with relatively high savings to "pull" marginal products into the ENERGY STAR program by allowing products with different energy savings to share the same score. Assuming it is EPA's intent for the "basic energy saving" products to meet the ENERGY STAR performance requirements *prior* to allowing more efficient products to be included within that product family, the specification would benefit from clarity to that effect. To the extent other ENERGY STAR requirements would mitigate our stated concern, stakeholders would likely benefit from a summary of how program requirements are designed to ensure the brand promise of ENERGY STAR is achieved by all products attaining the label. If existing ENERGY STAR requirements do not address this scenario, please modify the specification requirements to uphold Program integrity.

## **Target Discussions with Program Partners Regarding Unique Marketing Opportunities**

CEE shares EPA's expectation that the unique capabilities of connected thermostats could benefit from new approaches to consumer messaging and trust building. For example, because energy saving services could be utilized by non-ENERGY STAR thermostats, Partners may have an opportunity to engage with existing connected thermostat owners by allowing them to convert a product to ENERGY STAR through a certified service provider. We support ENERGY STAR's anticipated endeavors to help programs assess the potential opportunities and messaging associated with connected thermostats, and are committed to helping build a common understanding among programs in the US and Canada in early 2017.

CEE would once again like to thank EPA for the opportunity to comment on the ENERGY STAR® Version 1.0 Final Draft Connected Thermostats Specification. Please contact CEE Deputy Director John Taylor at (617) 532-0944 with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Ed Wisniewski". The signature is written in a cursive style with a large initial "E".

Ed Wisniewski  
Executive Director