

August 5, 2015

Ms. Abigail Daken
US Environmental Protection Agency
1200 Pennsylvania Avenue
Washington, DC 20460

Dear Ms. Daken:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to *Draft 1 Version 1.0 ENERGY STAR® Program Requirements for Connected Thermostat Products* released by the Environmental Protection Agency (EPA) on June 17, 2015.

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 45 US states, the District of Columbia, and seven Canadian provinces. In 2013, CEE members directed nearly \$6.4 billion of the \$8 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. We wish to recognize the significant contribution of the Electric Power Research Institute (EPRI) towards the development of these comments, particularly with regard to the analysis of energy savings data from connected thermostat pilots.

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.

We Laud EPA's Stated Objectives, But Are Unsure if a Measurable and Reproducible Basis for Energy Savings is Possible

CEE lauds EPA's continued effort to credibly distinguish opportunities for energy savings within the HVAC controls market. In particular, we agree that this area would benefit the consumer if the energy savings claims of thermostat manufacturers could be credibly compared, and if stakeholders could accurately predict the energy savings resulting from the installation and use of a communicating thermostat. The federal government is likely well positioned to credibly assess the savings potential of connected thermostats and to determine if a viable test procedure is possible. However, we question whether it is premature to propose an ENERGY STAR label given the need to define a credible metric for characterizing performance.

The ENERGY STAR logo is a powerful market tool for differentiating efficient products, but it does not yet appear that there are sufficient grounds for including connected thermostats into the portfolio at this time. Several issues must be addressed before CEE members can assess if and how ENERGY STAR should enter the market. Specifically, members have questions regarding the ability of ENERGY STAR to:

- Consistently deliver cost effective savings to the consumer that persist throughout the lifetime of the product;
- Deliver energy savings with no compromise in customer amenity or satisfaction; and
- Effectively differentiate the highly efficient products from standard efficiency products.

CEE is therefore concerned about the potentially negative impacts that may arise from introducing a specification in this area until these issues are better resolved. We support EPA's investigation and ongoing pursuit of connected thermostats; however at the given time, with the absence of foundational elements to provide credible consumer guidance, we cannot support the use of ENERGY STAR for this category of products.

We look forward to working with EPA to address questions raised by program administrators, and will strive to provide consensus comments once the foundational details are established.

CEE would once again like to thank the EPA for the opportunity to comment on Draft 1 Version 1.0 ENERGY STAR® Program Requirements for Connected Thermostats Products. Please contact CEE Program Manager Alice Rosenberg at 617-337-9287 with any questions about these comments.

Sincerely,

