

ENERGY STAR Connected Thermostat Savings Method Draft 1 Version 1 Stakeholder Comments

Summary of Comments

EPA Response

General

One stakeholder suggests that input run time data to the minute is sufficient accuracy for our purposes. Another stakeholder recommends the field savings method provide additional information about the approach for calculating energy savings, including but not limited to:

1. Data inputs, the calculations that will be performed, and resulting outputs;
2. The process for selecting a representative sample;
3. What data will be collected, and how;
4. A verification process for manufacturer data inputs;
5. Minimum requirements for data completion; and
6. Procedures to address minor data gaps that are within allowable levels.

EPA has included considerably more information in the Draft 2 method to demonstrate savings, including data retention requirements and a procedure for sampling. A detailed description of the software (including data completion and interpolation) is also included by reference. In the future this material will be directly included in the test method. Some additional information is more appropriately part of the specification, and will be included in the next draft. EPA welcomes stakeholder input about any further clarification that is needed. On run time data, EPA agrees that one minute is sufficient accuracy.

Climate Zones

One stakeholder encourages EPA to consider setting areas based on the EIA's established regions

EPA agrees and when asking for data or working with regional results, proposes relying on EIA climate regions. In order to generate useful statistics from zones with little population, a reduced set of five zones will be used.

Credibility

One stakeholder asked that EPA implement a verification program for field savings data as part of the initial version of Connected Thermostat recognition, including ensuring representative accuracy, data accuracy and data integrity. The stakeholder also recommends comparing the results of the metric to metered energy savings at a subset of customer sites in the future.

One stakeholder recommends that before finalizing the version 1 method to demonstrate field savings, EPA understand the influence of various factors such as housing type, building orientation, housing occupancy, etc., on the metric results and their relation to metered energy savings. They also recommend that EPA use metered energy savings to verify that the proposed avoided run time methodology results in accurate estimates of energy savings.

Another stakeholder supports the proposed requirement of twice-yearly data submission. The commenter also suggests EPA consider a small audit for all first time data submitters, with auditing of 10% of heating savings results and 10% of cooling saving results on an ongoing basis. In addition, the commenter suggests that providers be required to submit updated metric results whenever major software updates take place.

EPA proposes several changes in the Draft 2 test method to increase auditability of the metric calculation process. EPA will not be implementing auditing for the version 1.0 specifications, and encourages stakeholders that are interested in additional assurance to explore their own auditing programs. EPA believes that the M&V process in place at utilities will contribute valuable data to correlation between metric scores and metered savings, and looks forward to working with stakeholders to maximize this effect. EPA is interested in the idea of requiring score recalculation after a major software update, though at least 6 months would need to pass after the update before the metric score would show the effects.