

U.S.Environmental Protection Agency
Office of Air and Radiation
ENERGY STAR Program
Washington D.C. 20460

July 11, 2019

Re: Comments on the Smart Home Energy Management Systems (SHEMS) 1.0 Specification Draft 2 , Draft 2 Method to Determine Field Performance, and Draft Partner Commitments

Dear EPA Energy Star Program Management:

On behalf of Google, thank you for the opportunity to comment on the second draft of the SHEMS specification., We want to support this effort to help ensure its success. This letter provides our comments to help inform the next version of the specification.

Comments on the Smart Home Energy Management Systems (SHEMS) 1.0 Specification Draft 2:

Lines 242-243: vacation lighting budget

The budget of 0.03 kWh per day is extremely ambitious and may not be realistic, especially in larger homes. The total energy savings from 0.03 kWh/day compared to, for example, 0.1 kWh/day amounts to less than 2 kWh per year for a household that vacations four weeks per year.

Lines 378 - 383: Grid Communications and Access:

Note that some thermostats may not act directly on a DR signal. The DR signal may be received or detected by another provider-run system and relayed to the thermostat by some other means (e.g. Cloud computing). We assume that this arrangement would be acceptable, as it is with ENERGY STAR Smart Thermostats today.

Lines 425 - 428: note on field data collection

With regard to the note on field data collection, we are concerned about the phrase 'will refrain from sharing non-anonymized data publicly without further stakeholder discussion' on line 427. We think it should be replaced with "will not share non-anonymized data publicly".

Comments on Draft Partner Commitments

We welcome the addition of this document generally, as it clearly presents provider commitments.

Section 1.1.5

It is not clear what is meant by 'competing package'. For example, a company could offer a variety of devices or systems that offer opportunities to save energy. It would not be in the public interest to prohibit other offerings simply because they compete with some aspect of SHEMS, or because they include devices that are not in a category covered by ENERGY STAR. In addition, this requirement may be difficult to enforce.

We look forward to seeing the next draft of SHEMS, and are ready to support you in whatever way we can.

Sincerely,

Rick Counihan
Head Energy Regulatory Affairs
Google Devices and Services
rcounihan@google.com

Michael Tennyson
Technical Program Manager
Google Devices and Services
mtennyson@google.com