

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

May 3, 2019

Re: Comments on the Smart Home Energy Management Systems (SHEMS) Draft 1  
Specification and Draft Method to Determine Field Performance

Dear EPA Energy Star Program Management:

Thank you for the opportunity to provide feedback on the first draft of the SHEMS specification. Google appreciates the opportunity to be involved with this initiative, and want to support you to ensure its success. Below are our comments and questions to help inform the next version of the specification.

1. We want to understand how a SHEMS system is packaged or bundled. For example, it is not clear if SHEMS components are all expected to be sold in the same box, or if individual components can be bundled together (e.g. shrink wrapped, or bought online in a single purchase). We refer to the former as a 'hard bundle' and the latter as a 'soft bundle'. Are either okay? We are concerned that there will be a low rate of adoption by consumers if only 'hard' bundles are allowed. Creating hard bundles that combine components from different vendors is operationally challenging and incurs additional expense.
2. In the case of a 'soft' bundle, it is not clear if the ENERGY STAR logo has to be applied to the packaging, on the website where the order is placed, or on one of the products. We would favor for online sales having the option to show the ENERGY STAR logo when selecting a SHEMS compatible bundle, without requiring additional logos on each component.
3. Some customers may already have one component (such as a thermostat). If the customer then adds a smart outlet and a smart bulbs, it is not clear if this would constitute a SHEMS. We would favor for online sales having the option to show the ENERGY STAR logo when adding new products to known prior purchase(s) to form a SHEMS compatible bundle.

4. An energy utility marketplace might be a great place to sell soft bundles. The energy partner would typically value the prospect of encouraging energy savings, and might be motivated to create the bundles and promote sales to their customers.
5. Protecting the data privacy of users is a key element of Google's business. Don't underestimate the complexities involved in gathering data, and the limitations imposed by privacy concerns. Gathering and storing data should be predicated on defining the need for the data, e.g. defining metrics for certification purposes, and specific user benefits.
6. Also related is the complexity of gathering the data from other devices. Sharing data from components made by other companies presents a number of issues as well. Standards must be developed for sharing this data. More investigation and work needed to determine precisely what data should be collected, and how it is used.

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

Sincerely,

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