



Mysa Smart Thermostats
34 Harvey Road, Suite 402
St. John's, NL, Canada
A1C 2G1

September 14, 2022

Attn: Abigail Daken

Company: United States Environmental Protection Agency

Re: ENERGY STAR Smart Thermostat Products Method to Demonstrate Field Savings Draft 1 Version 2.0 and Method to Demonstrate Field Savings Draft 1 Version 2.0

Ms. Daken,

This letter is in addition to the comments provided by Mysa Smart Thermostats on August 19, 2022 in response to the United States Environmental Protection Agency (U.S. EPA) request for comments on the Program Requirements Product Specification for Smart Thermostat Products Eligibility Criteria Draft 1 Version 2.0 and the Method to Demonstrate Field Savings Draft 1 Version 2.0. Mysa appreciates the opportunity to work with EPA and provide feedback on these standard drafts.

Mysa Smart Thermostats was founded to fight climate change through energy efficiency and conservation. We understand the potential of energy efficiency to reduce both customer consumption costs, and greenhouse gas emissions. Line-voltage heating consumes a high amount of electricity, and therefore optimizing the control of this heating offers significant energy savings potential. This is why Mysa has been advocating for line-voltage heating to be included in the ENERGY STAR Smart Thermostat standards.

In the initial letter, Mysa expressed concern over changing the standby power consumption requirement in Table 1 from 3W in Version 1.0 to 1W in Version 2.0 (Line 120). Following this comment, Mysa conducted internal testing and investigation of several line-voltage thermostats on the market. The standby power measurements are included in the table below.

| Line-Voltage Thermostat | Wiring Configuration | Standby Power (W) | Active Power (W) |
|-------------------------|----------------------|-------------------|------------------|
| A | 3-wire | 2.4 | 3.6 |
| B | 3-wire | 1.56 | 1.8 |
| C | 3-wire | 2.56 | 2.86 |

Mysa wishes to express concern that by changing the standby power requirement from 3W to 1W, the new standard could inadvertently be excluding line voltage thermostats from becoming ENERGY STAR certified. It is also a large jump from 3W to 1W for manufacturers who are already certified under the existing standard. Therefore, Mysa proposes that EPA maintains the existing 3W standby power requirement.

In conclusion, Mysa appreciates the U.S. EPA's efforts to update the ENERGY STAR Smart Thermostat standard. We thank the U.S. EPA for the opportunity to be involved in this process. We also encourage the U.S. EPA to consider the recommendations outlined in this letter. We look forward to continuing working together, and reviewing the next drafts of these standards.

Sincerely,



Natasha Reid
Product Manager, Utility Initiatives, Empowered Homes Inc.