

July 21, 2014

Submitted via email ClimateControls@energystar.gov to:

Abigail Daken
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW, MC 6202J
Washington, DC 20460

*Re: Nest Labs' Comments on ENERGY STAR Climate
Controls New Approach*

Dear Ms. Daken

Nest Labs, Inc., a wholly owned subsidiary of Google, Inc., supports EPA's renewed effort to bring to bear a new ENERGY STAR label for climate controls, and we are pleased to submit these comments into the record.

Nest Labs' primary interest in any new ENERGY STAR program for climate controls is to ensure that such a standard focuses on real-world energy-saving performance. Nest agrees with the proposed approach of using an empirical basis for comparison, rather than looking at more ambiguous indirect indicators, such as usability or the presence of device features that may or may not actually be used. An empirical approach will focus on what really matters: which climate controls do the best job of saving energy. We are also pleased to see EPA's emphasis on using thermostat data rather than requiring that electric or gas meter data be used as the basis for empirical analysis. This is preferable, not only because of the many issues pointed out in EPA's presentation, but also because of the burden of additional permissions, data collection, and transfers from utilities to manufacturers that would be required if meter data is used.



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Regarding the qualification criteria, we would like to submit the attached study carried out by Fraunhofer in cooperation with Nest. The study methodology is closely aligned with EPA's proposed approach - and goes a step further by demonstrating the metric with an actual sample analysis from Nest thermostats in the field. Several practitioners in the industry have reviewed this paper. We would like to offer it as a framework and starting point for the discussion around methodology for ENERGY STAR labeling purposes.

With respect to data, we agree with the approach set out by EPA. Safeguards for individual user data already exist without the need for additional measures being developed at this time; the data needed to support an empirical approach can be obtained from aggregated and anonymized data sets without reference to any individual's personally identifiable information. In addition, for purposes of the ENERGY STAR program, we would like to see a mechanism whereby nationally recognized third parties such as Fraunhofer could be involved in reviewing study results produced by manufacturers.

We look forward to working together to create a new ENERGY STAR standard for climate controls.

Sincerely,



Isabel Guenette
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