

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

August 9, 2021

Re: ENERGY STAR® Smart Thermostats Version 2.0 Specification and Test Method Discussion Guide Comments.

Dear EPA Energy Star Program Management:

Thank you for the opportunity to provide comments on the Version 2.0 Smart thermostat specification. Resideo is appreciative of the opportunity to provide comments and supports this next version efforts, with the following section topics.

2.1.2 – We are supportive of larger sample sizes

2.1.3 – We would be supportive of either approach if the population total is kept confidential

2.2.4 – While not specific to the Energy Star metric and resolution of the data involved, an analysis we participated in to quantify energy savings recommended samples over 1100

2.2.5 – Resideo does not participate in any active programs with direct access to AMI data. We did participate in a recent effort with NEEA to match AMI data to Energy Star V2 data, but had challenges acquiring customers to give their consent (<0.2% of targeted customers using a donation incentive). Fortunately, we were able to piggyback on multiple DR and EE program T&Cs language to grow the population and might be a path forward if certain regions.

2.2.6 – Energy Star might have success in sponsoring a national program to combine efforts by regional and state efficiency organizations.

2.2.7 – Utilities tend to lack the IT infrastructure to support efforts like this, but utility program implementors like ICF might have a better sense of the reality. We would be supportive of exploring this approach.

2.3.8 – We do not believe we will be impacted by different weighting

3.1 – We would like to have additional discussion, around the intent on this section, so we can provide additional comments accordingly.

4.1. We are supportive of Smart Line-Voltage Thermostats (LVTs) and are willing to participate in the development of the metric for these products.

6.1.32 – We did not have any difficulty running Version 2.0 of the software while testing our ability to produce our first pass of the new interval data format.

6.1.33 – No additional recommendations now, but we have seen the usefulness of the V2 interval data file increase in utility program M&V efforts.

We are encouraged by the development details of the V2 spec and appreciate the opportunity to provide comments and look forward to continuing to work with you, through the complete development process.

Please don't hesitate to reach out if you have additional questions or concerns.

Sincerely,

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