

ENERGY STAR Connected Thermostat Final Draft v1.0 Specification Stakeholder Comments		
Topic	Comment Summary	EPA Response
Open Platforms	One stakeholder is a strong supporter of the adoption of open platform connected thermostat devices and commends EPA for taking this approach	Thank you for your comment.
Data Collection and Privacy Issues	<p>A stakeholder commented that the CT field savings methodology may require significant investment to enable CT service providers to collect, analyze and report CT data. This stakeholder also has concerns about protection of customer CT interval data.</p> <p>A second stakeholder commented that some manufacturers have more installed products across more climates and that the specification should provide a level playing field for all manufacturers, taking into account that in some cases, data available for reporting may be limited. This stakeholder further commented that there may be cases where stringent corporate customer privacy policies act as a hurdle for collection of interval CT data from customers' homes.</p>	<p>EPA understands these concerns and seeks to balance them with the need to have sufficient field data to demonstrate savings. The V1.0 Method to Demonstrate Field Savings 1) sets fixed data set size at 250 CTs per climate zone and 2) allows CT service providers to submit all CTs for climate zones in which they have <250. This approach does two things: it allows CT service providers with fewer deployed CTs to participate, and it levels the playing field by not permitting savings to be assessed using >250 CTs per climate zone (which would result in tighter confidence limits).</p> <p>As for data privacy, EPA notes that CT service providers need only report aggregate savings and associated statistics that do not include any personally identifiable information or data from individual CTs, which meets the privacy needs of most providers. EPA notes that CT service providers that collect customers' interval CT data publish their privacy policies and strive to act as trusted custodians of their customers' private data. For CT service providers with corporate privacy policies that disallow collecting interval data from customers' homes (as required by the version 1.0 specification), EPA is willing to consider for future versions other ways to develop equivalent performance data.</p>
Future Opportunities	A stakeholder encourages EPA to consider more accurate methods of monitoring CT energy consumption in future revisions. Another stakeholder commented that they look forward to working with EPA to evaluate and improve CT savings method and benchmarks in the future and encouraged EPA to add a "Future Criteria Revisions" section that includes consideration of more stringent criteria for standby power and static temperature accuracy.	EPA encourages CT stakeholders to continue to share specific ideas for improving the ENERGY STAR CT program. In the Final V1.0 Connected Thermostats specification, EPA added a Future Criteria Revisions section that includes consideration of more stringent standby power and static temperature accuracy limits, as well as consideration of criteria that ensures minimal use of inefficient electric-resistance based aux/emergency heating associated with heat pumps. Finally, this section presents broad topics for future refinement of the CT field savings method.
Product Family Definition	Two stakeholders' comments expressed concern that that the product family definition in the final draft might enable products with marginal savings to qualify as ENERGY STAR and that the product family definition should assure utilities and their customers that individual CT products will provide energy savings equal to or greater than the ENERGY STAR minimum levels.	EPA appreciates these comments and confirms that they are consistent with EPA's intent. The requirement on the 20th percentile of savings helps ensure that all products in the product family deliver savings. In the Final specification, EPA has expanded the product family examples in Section 4.
Partner Education	A stakeholder encourages EPA to educate partners on the credibility of the Method to Demonstrate Field Savings and to pursue acceptance of the validity of the ENERGY STAR field savings methodology.	EPA appreciates this comment and agrees that stakeholder education is important, to help stakeholders understand the efficacy, value and limitations of the ENERGY STAR CT field savings methodology.
Target Discussions on Unique Marketing Opportunities	A stakeholder commented that they share EPA's expectation that the unique capabilities of CTs could benefit from new approaches to consumer messaging and trust building. For example, because energy saving services could be utilized by non-ENERGY STAR CTs, Partners may have an opportunity to engage with existing CT owners, enabling them to save energy or possibly convert a CT product to ENERGY STAR by switching to a different CT service. This stakeholder supports EPA's anticipated endeavors to help programs assess the potential opportunities and messaging associated with CTs, and are committed to helping build a common understanding among programs in the US and Canada in early 2017.	EPA appreciates this comment and looks forward to working with partners and other interested parties to help maximize the tremendous savings potential of this product category through targeted consumer messaging and other means.