

Submitted by email (connectedthermostats@energystar.com)

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ENERGY STAR SMART THERMOSTATS V2.0

Hi Abigail,

I would like to thank you for the opportunity to take part in the process leading to the update of the new Energy Star specifications for smart thermostats.

We particularly welcome the discussion around the possible inclusion of smart line voltage thermostats. Although currently less prevalent on the market, on the North American scale, electric heat is bound to increase in the future given the move to electrification and the energy transition. Setting the proper bases for energy savings today will have a significant impact on existing installations and set the stage properly for things to come.

Of the various topics in this discussion, there are a few for which we would like to provide some input.

Existing standards

The performance guidelines that would eventually be set forth for line voltage thermostats should use the CSA C828-19 standard as a baseline. CSA C828-19 has established good requirements for energy efficiency, and it would be unfortunate to implement a new standard with lower requirements.

We STRONGLY suggest that for the Canadian market, that smart line voltage thermostats be certified to the CSA C828-19 standard to be eligible for the Energy Star branding.

Demand response requirements

When it comes to the standardization of communication protocols for DR, we see both advantages and disadvantages. We believe that further evaluations and information are required for a truly informed decision that will facilitate fast deployment, to take advantage of energy savings as quickly as possible, while considering the infrastructure requirements for utilities and manufacturers, with an eye towards new technologies that could further improve DR.

We believe that limiting the choice of applicable standards would deter some companies from adhering to DR programs that already have a proprietary protocol that works and can work with the open standards using an API.

Climate zones

We believe that considering the requirements of Northern and Southern climate zones separately is necessary. Areas where the predominant demand is heating have very different energy consumption characteristics than areas where cooling is more prevalent.

Sampling for metrics

Along the same lines, it would be imperative that the input system allows the inclusion of Canadian addresses for a truly representative sampling of cold weather performance.

Participation

The following people from our organization would like to participate and contribute to future discussions and workshops.

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I hope that this information will be helpful for the upcoming discussions, and I want to reinforce our interest to be part of further discussions to support the EPA and this initiative.

Best regards,
Jason Bylinski