



Re: ecobee comments on Final Draft Version 6.0 ENERGY STAR® Central Air Conditioner and Heat Pump (CAC/HP) specification

Date: 11/19/2020

ecobee thanks the U.S. Environmental Protection Agency (EPA) for the opportunity to comment on the Final Draft of Version 6.0 of the ENERGY STAR® Central Air Conditioner and Heat Pump (CAC/HP) specification. ecobee is submitting comments as a leading developer of HVAC controls.

ecobee recommends the following addition to the final draft, underlined in bold below:

DR Communications Protocols

The CCS shall meet the communication and equipment performance standards for CTA318 2045-A or OpenADR 2.0b, or both **or meet the DR communication protocols listed in the ENERGY STAR® Connected Thermostat specification.**

ecobee believes there is value in providing a consistent framework for grid communications and open access between the ENERGY STAR® Central Air Conditioner and Heat Pump (CAC/HP) specification and the ENERGY STAR® Connected Thermostat specification. Specifically, the ENERGY STAR® Connected Thermostat specification requires:

a. Grid Communications – The CT product shall include a communication link that facilitates the use of open standards, as defined in this specification, for all communication layers to enable DR functionality. Note: CT products that enable direct, on-premises, open-standards based interconnection are preferred, but alternative approaches, where open-standards connectivity is enabled only with use of off-premise services, are also acceptable.

b. Open Access – To enable interconnection with the CT product over the communication link, an interface specification, application programming interface (API) or similar documentation shall be made available that, at a minimum, enables DR functionality. Note: While EPA encourages broad availability of the interface spec or API, CT service providers may elect to limit dissemination of these documents to certified/qualified developers, integration partners and the like.

ecobee encourages EPA to make this addition to the final specification to enable greater flexibility.

Thank you for taking these comments into consideration.

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