From: Douglas, Jon
Sent: Friday, April 30, 2010 3:52 PM
To: 'ClimateControls@energystar.gov'
Cc: Kerber, Tom
Subject: Comments regarding Energy Star Climate control specification

Energy Star Staff,

The following are comments regarding the draft version 1.0 Energy Star Climate control specification

Regarding lines 420-422: The product must either be (1) a Communicating Climate Control, as defined in Section 1.A421 above, or be (2) field upgradeable to a Communicating Climate Control by installation of a communication module.

If a manufacturer chooses the field upgradable communication option, they will develop two components; a thermostat, and a communication interface kit. It is not clear whether the manufacturer will be required to produce communication interface kit immediately at the time of Energy Star certification or will be permitted to wait until market demands support the development of the interface kit.
Due to the limited market demand for communicating interfaces and the large number of possible communicating protocols, it is difficult to justify the development costs of a communicating interface. We would like to see the future upgradability requirement clearly indicate that manufacturers must demonstrate the capability of future communications, but are not required to develop the interface until justified by market demand.
Regarding Lines 604 – 607 “The product shall consume no more than 0.5 watts of power in any operational mode. For Communicating Climate Controls, compliance with this limit applies only to the Residential Climate Control; it does not apply to the Residential Climate Control with installed and/or active communication capability. “

Are communicating climate controls exempt from the 0.5 watt power limitation? The text is not clear. 0.5 watts is much lower than the power consumption of communicating thermostats with graphical user interfaces currently on the market.
Meeting the improved user interface requirements prescribed by the Energy STAR specification requires graphical displays and faster processors which consume more power than a standard thermostat.
As an alternative, we would like to see a 3 watt power limit applied only when the climate control is operating, but not interacting with the user or external communication. Once setup, most users rarely interact with their climate control, so this will limit the power consumption during the vast majority of the time the control is operating.

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