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Subject: ENERGY STAR Climate Controls Specification Florida Power & Light comments

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Abigail,

Thank you for the opportunity for Florida Power & Light Company to once again provide comments on the forthcoming Energy Star Climate controls specifications. We appreciate EPA addressing our previous concerns about humidity controls by withdrawing any requirement for humidity sensing and control. There are four remaining areas regarding climate controls we feel we need to address.

1. We still believe the default program for Energy Star daily temperature set point changes should be varied according to climate zone. For instance, defaulting to a heating temperature set point of only 62 degrees F may seem normal in much of the U.S., the standard recommendation for FPL's territory is 68 degrees F for the energy efficient heating set point.
2. We agree with the change you made to the cooling sleep set point temperature which keeps the temperature at 78 (the same as "return" temperature) rather than raising it several degrees during the overnight hours. In the Florida climate, the outdoor temperature in summer remains in the 80s for much of the night. Since a large FPL study of programmers and non-programmers clearly showed customers who program typically set the temperature 1-2 degrees colder before bed, holding the temperature steady at the evening set point would represent an energy efficient action.
3. One function of thermostats defined under this specification is to provide a utility load control capability. We are aware of variability between thermostats by different manufacturers in the way they respond to load control signals while in the hold mode. For example, some thermostats will ignore the load control signal while in this mode. We recommend the Energy Star specification require the thermostat to respond to a load control signal in all modes including "hold".
4. At a recent webinar on this topic, we understood that the EPA has no plans to test Energy Star qualifying Climate Controls to quantify energy savings. Since the Energy Star brand has become synonymous with energy savings, measuring the energy impact would demonstrate the effectiveness of these new standards and provide a basis for future improvements to the program. We recommend EPA reconsider performing formal evaluation to quantify energy impacts.

Thank you for considering our comments.

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