**From:** Gabe Torok
**To:** ClimateControls@energystar.gov;
**cc:** daken.abigail@epa.gov; Frazee, Douglas;
**Subject:** Comments on Draft 2 Version 1 Climate Control Specification
**Date:** Thursday, July 22, 2010 11:20:17 AM

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In response for comments on Draft 2 Version 1 Climate Control Specifications I offer the following;

All comments are regarding humidity accuracy and control and are a follow-up to my April 28th letter to Ms. Abigail Daken.

Maintain humidity level, Line 532. This statement is vague. It is appropriate for maintaining desired humidity levels in the HEAT mode but not in the COOL mode. During cooling the need is to limit the maximum humidity to prevent mold and mildew formation, not to maintain humidity levels.

Humidistat accuracy, Line 533 to 535. The relaxation of humidistat accuracy from 3% to 5% is disappointing since as I informed Doug Frazee the cost differential is approximately 50 cents. In addition, since there is no long term drift specification there could be a significant further inaccuracy after the unit is installed. Considering that other EPA specifications, such as the one on energy efficient light bulbs, do have aging requirements it is my opinion that not having long term humidistat accuracy specifications may lead to humidity caused problems in vacant homes. Note that this is not an energy saving issue but an environmental issue.

Complexity, Line 538. Leaving the implementation of humidity control to the manufacturers will most likely result in very few products that have independent temperature and humidity control. As I have previously stated, without such a feature the maximum humidity in a vacant summer home in humid environment cannot be assured. The Florida Solar Energy Center study of 2006 has categorically stated that setting the thermostat to 85 or even 83 degrees may not prevent mold or mildew formation and that humidity control is required. Note that there are a few manufacturers, such as Lux Products, that do make reasonably priced Climate Control products with independent humidity control, therefore the comment on complexity has little basis.

The higher accuracy and long term stability of a humidistat and independent control is not needed primarily for reducing energy consumption but to prevent the formation

of mold and mildew.

If customers use the “Away” function as currently defined in the specification there is a possibility of unacceptable environmental damage to homes. I wish to be on record that manufacturers and the EPA could potentially be liable to class action suits.

I urge the EPA to reconsider the humidistat specifications, not because of their impact on additional energy saving but because as currently specified, either homes may have potentially damaging environmental problems, or, the “Away” function will not be used in vacant summer homes in humid climates as intended by the EPA.

Respectfully,

Gabe Torok
Consultant