

EPA Energy Star Draft 3 Comments

3. A Technical Criteria

5. Put in provision that allows for a smooth setback recovery feature to limit the use of Auxillary (Electric heat).

6. Power consumption requirements is confusing. For such a lower overall power consumption is this really necessary? A device with a larger screen is much easier to use (especially programming) but you are penalized from a power usage standpoint. The bigger power saving potential is in making sure the device is properly programmed.

3.B. Communicating Criteria

1. Open Access – remove this requirement. There should not be a requirement for open access to third party companies. What should be required is access of “outward” data (ie. temperature settings, humidity, power usage, etc). The protocols which HVAC systems use to control their operation should remain proprietary. This will keep the industry from becoming over commoditized and keep the focus on innovation.
2. Connectivity Standards – Remove requirement for Smart Grid integration. Only say that the device needs to be able to be upgraded in the future to integrate with Smart Grid programs. Right now, there is no defacto standard and requiring integration with multiple protocols is unrealistic.
3. Security – this is dependent on 1 and 2. Recommend removing this requirement or making it optional.
4. Data Reporting – remove section that requires repeat of data every 5 minutes. There are better ways to do this.

3.D.1

- b. Date and Time – reduce 0.5 sec accuracy to 1 second. Storing time and date for 7 days is excessive. Recommend reducing to a few days.