

July 30, 2010

Katharine Kaplan  
Environmental Protection Agency  
1725 Eye Street NW, Suite 1000  
Washington, DC 20006

Dear Ms. Kaplan:

Thank you for the opportunity to provide input on the ENERGY STAR® Climate Controls Specification (Specification). On behalf of CEE and its HVAC, Evaluation, and Gas Committees (Committees), please accept the following comments.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 43 U.S. states and 8 Canadian provinces. In 2009, CEE members directed over \$6 billion of energy efficiency program budgets in the two countries. In short, CEE represents the groups that are actively working to make ENERGY STAR the relevant platform for energy efficiency across North America.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

**Provide Stakeholders with Additional Time to Evaluate The Forthcoming Usability Metric**

When ENERGY STAR enters a new market (e.g. climate controls), EPA has an opportunity to provide ample time for stakeholders to evaluate all aspects of the proposed specification without concerns about rising market saturation or protecting market relevance. Longer comment periods are particularly important

when a new test method is being introduced. In anticipation that CEE's Behavior, Evaluation, Gas, and HVAC Committees will all want to carefully evaluate the new usability metric now in development, we recommend EPA postpone the proposed effective date from November 1, 2010 to some time during the first quarter of 2011. The November effective date does not provide sufficient time for CEE's members to consult with their industry partners and develop robust technical comments on the new usability performance metric. Due to past program evaluations questioning the energy savings associated with HVAC controls, the stakes are particularly high.

A secondary reason to postpone the effective date is that a longer specification development timeline would provide EPA time to confirm that the prescriptive path requirements are robust enough to identify products that would also pass the usability test of the performance path. CEE believes it is critical to the integrity of the specification—and the ENERGY STAR Brand—that both paths yield consistent, credible results.

### **Incorporate Focus Group—or Similar User Group Testing—Into the Specification Development Process**

Postponing the effective date until the first quarter of 2011 would also provide time for EPA to test how consumers would interact with products meeting the currently-proposed requirements. Similar to the process used in new product development, EPA is encouraged to “mock up” products that would meet the proposed requirements (or locate existing products and purchase them off the shelf), and have typical consumers attempt to use them to save energy. CEE is particularly interested in seeing EPA test the aspects of the proposed ENERGY STAR specification listed below. Testing could be through focus groups of consumers or some other commonly accepted means of testing product usability.

- **Core Prescriptive Requirements:** Do products meeting the proposed requirements consistently yield consumer behaviors that save energy?
- **Heat Pumps in Electric Resistance Auxiliary Heating Mode:** Do EPA's suggestions (line 460 in the draft 2 specification) clearly convey the intended information and yield the desired energy saving behaviors?
- **Time of Use (TOU) Price Signals:** Do LED lights with the proposed color scheme successfully inform disinterested users of current energy price as they walk by? Do price signals conveyed by LED lights routinely lead to an energy saving behavior by users? How do users in areas without TOU pricing react to the lights? Are LEDs more effective than using the LCD?

## Take Steps to Encourage Consumer Behaviors That Are Necessary for Humidity Control to Yield Energy Savings

CEE supports EPA's intention to label products that provide users with comfort and adequate control over all relevant energy saving technologies. In theory, humidity control could save energy in some climates, particularly in unoccupied homes where temperatures are allowed to float but humidity must be controlled in order to manage IAQ and prevent mold or mildew. The potential energy savings sought by EPA will only be realized if customers: a) understand how to correctly utilize the humidistat functionality, and b) choose to maximize savings over comfort. Based on the experiences of some committee members in humid climates, CEE is concerned that in the majority of cases, both of these conditions will not be satisfied, increasing the likelihood of increased energy use. If ENERGY STAR ultimately requires humidity control, CEE recommends that EPA develop a strategy to educate consumers about how this functionality can save energy.

Thank you again for the opportunity to comment. Please contact John Taylor, CEE Residential Senior Program Manager, at 617-532-0944 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Marc G. Hoffman".

Marc G. Hoffman  
Executive Director