

May 7, 2010

Katharine Kaplan
Environmental Protection Agency
c/o Christina Chang, ICF Consulting
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). I apologize that these comments are being submitted after the April 30, 2010 deadline, however, NYSERDA felt it was necessary to express our support for the ENERGY STAR Climate Controls Specification.

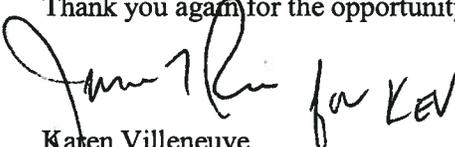
NYSERDA encourages EPA to prioritize the capability to save energy when setting requirements for labeled Climate Controls. While it may be difficult to set the specification for Climate Controls at a level that immediately generates significant energy savings enough to differentiate 25 percent of climate controls on the market, and remain cost effective. We believe that consumers shopping for a programmable thermostat understand that the ENERGY STAR label makes a distinction among products that achieve greater energy savings, and will purchase Climate Controls accordingly.

NYSERDA supports EPA's decision to require set default temperatures in the specification that will maximize energy savings without deviating from acceptable comfort norms.

Further, NYSERDA supports ENERGY STAR's plans to develop a usability benchmark to objectively evaluate whether products that earn the ENERGY STAR label will be easy for consumers to operate and will result in energy savings. However, NYSERDA encourages ENERGY STAR to pursue usability requirements that are performance based rather than prescriptive, to ensure that those Climate Controls that meet the specification will in fact deliver a user-friendly application.

NYSERDA supports EPA's efforts to address peak demand and to label products that enable consumers to respond to time of use rates that may be in effect in their local service territories. NYSERDA also support efforts to encourage standardized communication of these price signals to consumers, through the use of an LED light on the Climate Control.

Thank you again for the opportunity to comment.


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