

August 7, 2019

Ms. Katharine Kaplan
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Katharine Kaplan:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the Draft Version 2.0 Room Air Cleaners Limited Topic Proposal, released by the Environmental Protection Agency (EPA) on June 27th, 2019.

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 38 US states, the District of Columbia, and four Canadian provinces. In 2017, CEE members directed over 70 percent of the \$9 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR, so it may continue to serve as the national marketing platform for energy efficiency.

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.

CEE Seeks Clarity on the Value Proposition EPA Has Identified for Connected Room Air Cleaners

CEE has developed optional connected criteria for five residential products to date and with these criteria we have focused on identifying and differentiating units that help consumers realize energy and financial savings, increase the resilience and viability of the

grid, and contribute environmental benefits. CEE is interested to learn why EPA has identified room air cleaners as an important product for which to specify connectivity and what value propositions EPA hopes to deliver on with the current proposal. Once EPA has articulated these value propositions, CEE would be in a better position to provide feedback on whether the proposed connected criteria are able to achieve them.

If EPA Chooses to Include Connected Criteria for Room Air Cleaners, CEE Recommends Several Modifications to the Proposal

Pending EPA's identification of a value proposition for connected room air cleaners to deliver consumer benefit, CEE recommends that the criteria also enable utilities to achieve goals of energy management and demand response. Since 2011, CEE has been actively engaged in product connectivity and, over this time period, has developed [consensus principles of connected](#). To serve the needs of consumers and utilities across the US and Canada, we recommend that ENERGY STAR connected criteria for air cleaners include requirements that are compatible with these consensus principles. Below please find specific suggestions, which are consistent with previous CEE letters submitted in response to other ENERGY STAR specification revisions.

ENERGY STAR Connected Criteria Should Require Open Standards and Multiple Pathways to Connect

The CEE optional connected criteria for several residential products specifies that devices have connected capability through open standards and possess functionality that enable new benefits to customers or the grid. Connected products promoted with ratepayer funds must offer value to consumers across a diverse set of demographic characteristics. For these reasons, the ENERGY STAR Room Air Cleaner Specification would better serve program administrator needs by stipulating multiple pathways to connect, including an open, nonproprietary means for achieving two-way connectedness within the physical bounds of the customer's home.

Connected Criteria Should Contain Consistent Elements Across ENERGY STAR Product Specifications

While the connected criteria for other ENERGY STAR products are not always sufficient in meeting member needs, CEE appreciates that the criteria are consistent across the home appliance category. It is notable that EPA has chosen to omit several key criteria in the

limited topic proposal for room air cleaners, specifically: 1) remote management, 2) operational status, user settings and messages, and 3) demand response.

CEE is concerned that treating products inconsistently across the brand could create potential consumer confusion around which capabilities a connected ENERGY STAR product will provide. Exclusion of these three criteria also presents potential negative implications from both a consumer control and demand response perspective and may reduce the ability of ENERGY STAR room air cleaners to be part of an [integrated home platform](#) in the future. Should EPA depart from past brand strategies for this connected criteria specification, CEE requests information or data that supports this decision and rationale.

CEE would once again like to thank EPA for the opportunity to comment on the Draft Version 2.0 Room Air Cleaners Limited Topic Proposal. As the voice for the US and Canadian Program Industry, CEE will continue to inform ENERGY STAR and its stakeholders. Please contact CEE Senior Program Manager Eileen Eaton at 617-337-9263 with any questions about these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski".

Ed Wisniewski
Executive Director