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Submitted by electronic mail to gduff@icfconsulting.com

Thank you for the opportunity to provide the following comments on your January proposals to revamp the Energy Star program for programmable thermostats (PTs). NEMA and representatives of its member companies participated in the January 11 stakeholder meeting, which, we believe, provided for a productive discussion of the proposals and allowed stakeholders to provide initial reactions to and point out potential consequences of the proposals. Since some of the possible consequences are unintended, we encourage you to proceed with your plans to consult extensively with program stakeholders, keep an open mind and be prepared to alter your plans based on stakeholder feedback.

The following comments are submitted on behalf of the member companies of NEMA's Residential Controls Section.

We agree with Energy Star on the need to develop a common consumer education campaign on Energy Star PTs, since a PT itself does not save energy but is a valuable tool consumers can use to lower energy consumption and associated heating and cooling costs. We look forward to working with Energy Star and utility providers to develop educational messages, graphics and materials to help owners and purchasers use their PT effectively to keep their homes comfortable and save energy at the same time.

As discussed at the January 11 stakeholder meeting, we strongly agree with Energy Star that the current requirement be maintained for an Energy Star Home to be equipped with an Energy Star qualified programmable thermostat.

On the issue of revising the Energy Star logo to be more effective in communicating to the consumer, we would request that existing packaging and manuals be grandfathered for a period of 5 years to spread out the cost of making changes. Moreover, the new logo must be designed in a way that does not need significant space to print, yet is still readable at that size.

However, we are concerned that Energy Star's proposal to scrap the technical performance specification aspect of the PT program would lead to a number of consequences that would damage the technology's and the program's reputation and the program's chances of meeting its goals of market transformation and energy savings.

Specifically, inclusion of mechanical thermostats would damage the Energy Star brand by equating the more advanced technology of PTs, which significantly reduces the amount of effort needed to save energy by automatically setting back to an energy saving temperature, with a mechanical thermostat that must be setback manually (a manual thermostat will not save energy for the times the homeowner forgets to set it back). Consumers will be misled into believing that PTs are no better and decline to upgrade their home system to include a PT.

An education campaign on proper and effective use of a PT should not be counteracted by the simultaneous removal of the Energy Star endorsement that PTs are quality products that take advantage of advanced technology to save energy and that should be chosen over mechanical models.

Energy Star has clearly stated its preference to eliminate the product specification based on the perception that to maintain the specification would be contrary to its goals. Given the importance of maintaining product quality, NEMA member companies are considering the development of a product standard that could take its place.

Resources at NEMA's disposal to develop a specification include, but are not limited to 1) the current specification, 2) proposed draft #1 of Version 2.0, and 3) draft #2 of Version 2.0, which was not formally distributed for comment. Suggestions made at the January 11 meeting for performance requirements included non-volatile memory, programmability, temperature control and adaptive recovery.

In addition, the current NEMA DC-3 testing standard is a good indicator of product quality and performance.

We expect that you will give these consensus comments appropriate weight in your deliberations and look forward to working with you as the revision process moves forward.

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