



# American Council for an Energy-Efficient Economy

WASHINGTON, DC

February 23, 2006

Mr. David Shiller  
ENERGY STAR Marketing Manager  
Environmental Protection Agency  
C/o Gwen Duff, ICF Consulting  
1725 Eye Street NW, Suite 1000  
Washington, DC 20006

Dear David:

On behalf of the American Council for an Energy-Efficient Economy (ACEEE), thank you for the opportunity to comment on the recent *Programmable Thermostat Program Proposal*. The American Council for an Energy-Efficient Economy is a nonprofit, non-partisan, organization dedicated to advancing energy efficiency as a means of promoting both economic prosperity and environmental protection. ACEEE fulfills its mission by conducting in-depth technical and policy assessments; advising policymakers and program managers; working collaboratively with businesses, public interest groups, and other organizations; publishing books, conference proceedings, and reports; organizing conferences and workshops; and educating consumers and businesses.

ACEEE recently reviewed the savings potential of ENERGY STAR programmable thermostats; our results are summarized in the attachment. We find no evidence from the five field studies found that installation of programmable thermostats is associated with energy savings. We therefore conditionally support your proposal to “transition” the program from an ENERGY STAR thermostat specification to an educational program.

Our condition is that the term “transition” be taken to mean “suspend,” in the sense that ENERGY STAR would review and reconsider its decision if robust field studies of sufficient size show that naïve users successfully use programmable thermostats to save energy, without instruction. We also recommend that EPA and its partners evaluate a new feature, an interface to enable peak demand management and energy savings. Public and utility program administrators may value programmable thermostats that will change consumer behavior to save energy without negatively impacting peak demand. At times of peak demand, line losses are highest, and in many situations the least efficient and “dirtiest” power plants may be brought online to meet demand. Both factors suggest that demand control can save energy and prevent pollution.

Because the engineering estimates of energy savings potential of programmable thermostats are large (5% - 15% of annual energy use), ACEEE remains optimistic that units that save energy and please users instead of frustrating them can make a difference. Until these are demonstrated, we support EPA’s proposal to work with partners to develop an effective consumer education program.

Again, thank you for the opportunity to comment on the ENERGY STAR programmable thermostat program proposal.

Sincerely,

Harvey M. Sachs, Ph.D.  
Buildings Program Director