



November 30, 2007

Christopher Kent  
Energy Star Labeling Branch  
U.S. Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Kent,

I am writing on behalf of the members of the NEMA Residential and Commercial Controls Section in response to Andrew Fanara's October 25 letter and the subsequent request for public comments on your proposals for the future development of the Energy Star labeling program programmable thermostats (PTs). Energy Star's latest ideas underscore that the future of the PT labeling program lies firmly in the hands of manufacturers.

We welcome your decision to maintain the current specification as industry and government collaborate on how to revise it. In the meantime, we can work together on consumer education, both to persuade consumers to purchase PT units that can save energy when used properly and to persuade consumers who already have PTs installed in their home to use them effectively to manage their comfort and achieve energy savings.

#### Consumer Education

Energy Star's proposals for a new consumer education campaign initiative should involve all stakeholders (retailers, distributors, installers, utilities, environmental groups, media outlets, governments and consumers) into the campaign and should have a positive effect on consumer behavior, which studies and experience show to be the key driver of energy savings.

As in past comments, we support Energy Star's plans for a consumer education campaign and are ready to work with Energy Star and other partners to begin developing "clear and consistent" messaging as soon as possible. The transition timing on developing new packaging and promotion materials will largely depend on how fast Energy Star staff convenes a stakeholder group and that group reaches agreement on the substance. If this is delayed too long, then Energy Star would have to reevaluate the 2009 transition date. Partners should have a menu of education marks that can be used on their PT products and educational materials. Some companies may oppose or choose not to use a logo that suggests thermostats are somehow related to global warming, for example. We look forward to working with Energy Star and other partners to develop this selection. In the same vein, we suggest that Energy Star guidelines be developed as to the energy savings claims manufacturers will be allowed to make in marketing

**National Electrical  
Manufacturers Association**  
[www.nema.org](http://www.nema.org)

---

1300 North 17th Street, Suite 1752  
Rosslyn, VA 22209  
703.841.3200  
Fax 703.841.5900

their products. Once consumer education messages are developed, we suggest that manufacturing partner and Energy Star education outreach material be offered not only through the Energy Star website and manufacturer websites but also through mass media outlets, especially television and popular internet websites such as Yahoo! Green (<http://green.yahoo.com/>).

We welcome Energy Star's new partner commitment forms and the requirement that each partner commit to the education program if they want to continue to use the Energy Star label on their products.


#### Collaboration on New Product Requirements

As we have explained previously, NEMA is taking on the task of writing a new standard for thermostat performance that could form the basis for new Energy Star product requirements. However, it is likely that the standard will not be concluded and approved until some time in late 2008. The March 2009 deadline for finalization of a new Energy Star performance specification leaves a small window for this transition. We are also cognizant that the extent and effectiveness of a new thermostat industry standard will go a long way in determining what the Energy Star consumer education program will really be able to say.

As discussed, we will keep Energy Star informed as to our progress on the standard. Companies interested in contributing to work on the standard should contact Gerard Winstanley, NEMA Program Manager, at [ger\\_winstanley@nema.org](mailto:ger_winstanley@nema.org) or (703) 841 3297.

Thank you very much for your consideration and assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Updyke', with a long horizontal line extending to the right.

Craig Updyke,  
Manager, Trade and Commercial Affairs  
(703) 841-3294  
[cra\\_updyke@nema.org](mailto:cra_updyke@nema.org)

cc: Gwen Dobbs, Senior Associate, ICF International