

# Northeast Energy Efficiency Partnerships, Inc.



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Dale Hoffmeyer  
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Dear Dale:

Thank you for the opportunity to comment on the series of proposed changes to the Home Performance with ENERGY STAR program. NEEP continues to be a strong supporter of the program and applauds EPA for striving to better it on a nearly ongoing basis.

Below, we raise several comments or points that could benefit from further clarification by proposal (P1, P2...). Please note that these comments represent the opinion of NEEP and may or may not be consistent with those of our efficiency program sponsors.

P1)

- i. It is unclear if the “Level 3 Contractor” inspection rate includes the first two tiers of testing or if the 5% starts once Level 3 has been reached.
- ii. Consistency between P1 and P6 needs to be revisited with respect to the tiers.
- iii. The question of who conducts the “on-site” inspections, sponsor or contractor should be clarified and NEEP recommends that on-sites not be allowed by the contractor rather by the sponsor or a separate agent of the sponsor.

P2)

- i. Clarification is necessary regarding consequences of delinquency in reporting, particularly the annual report.

P3)

- i. NEEP suggests telephone interviews should be mandatory, not recommended
- ii. NEEP suggests the mandatory in-person interview should be identified as an integral and required part of the mandatory walk-through of house.
- iii. The term “Base-load” often has different meaning in various different contexts and with differing audiences, therefore it needs to be defined clearly for these purposes.

- iv. NEEP cautions that HVAC inspections require licensed professionals in some states, making this provision onerous and costly in those states.
- v. NEEP suggests some additional discussion and clarification on how an inspector could receive utility bill data for disaggregating purposes prior to in-person meeting with homeowner and whether there are potential privacy concerns in this regard if the assumption is such data is obtained from the sponsor.
- vi. NEEP suggests that the recommended number of months of billing data be specified.
- vii. It is questionable whether the majority of auditor/inspectors functioning in these programs are qualified and/or competent to provide renewable energy potential inspections.
- viii. Although we support string health and safety provisions, NEEP cautions that they continue to put pressure on the cost effectiveness of the program from a ratepayer funded program perspective. Addressing ways to identify these costs and exempt them from benefit-cost tests would be a worthy exercise.

P4)

- i. Energy savings and payback period are required to be provided to the customer at the time of sale of improvement measures, based on modeling estimates or stipulated savings. Since actual performance of projects as installed is assumed to be measured in order to award Summary Certificates, could (should?) not it be a requirement that the customer be provided the measured savings and payback data of the projects as installed? Such a performance summary for all homeowners may improve customer satisfaction, but also results in higher costs to the program.

P5)

- i. NEEP suggests clarification of whether the customer receives copy of the “Post Installation Tests and Inspections” form?

P6)

- i. NEEP suggests the explanations of the scoring methodology in section 1.4 are difficult to understand and could benefit from additional, more detailed description.

P7) No comments

P8) No comments

Again, thank you for the opportunity to comment and feel free to contact me at (781) 860-9177 ext. 26 should you have need.

Best Regards,

Ed Schmidt  
Director of Regional Initiatives