

July 30, 2007

Dear Dale:

Thank you for giving National Grid and our Home Performance with Energy Star (HPwES) vendors the opportunity to review and comment on the Proposed Changes to HPwES. While reviewing your document it became clear that most of the changes and policy recommendations apply to a contractor based program as spelled out in Document P2, "Active participation from at least 3 contractors/consultant...". As you know National Grid as a HPwES sponsor utilizes a different compliant model than the contractor based one that you propose. In our HPwES National Grid oversees a single vendor implementing the Massachusetts program and another for Rhode Island. We feel that this model works well for our programs and our customers as these vendors are fully BPI certified and perform QA on 100% of the jobs completed in their respective states. Each vendor was selected as a result of a competitive bid process that required bidders to be BPI certified as well as to have vast experience in residential energy analysis and retrofit programs. These vendors are solely responsible for implementing our programs. Furthermore, National Grid's current program model and approach has resulted in significant home energy improvements and has done so in a cost effective manner following the requirements of HPwES whenever major shell tightening retrofits are implemented. National Grid as the program sponsor pays for a portion of the cost of installing energy efficiency measures. As such we feel that our substantial investments under our present model are spent much more efficiently and we are able to oversee our budgets much more efficiently. The number of BPI certified contractors in the New England area is limited. We feel that our customers are best served by having certified contractors performing HPwES services in our customers' homes.

National Grid feels that the three contractors requirement would hinder our ability to provide comprehensive services to our customers and the success of our present program. National Grid's recommendation would be to waive the three contractors guideline for non contractor based programs such as those offered by National Grid in New England.

We would also question the need to perform a number of diagnostic tests, i.e., blower door, Duct Blaster, combustion efficiency, during the HEA. National Grid's BPI certified vendors do perform these test when necessary. They may be performed during the HEA, prior to and after installing measures, or during the actual installation of measures. We would suggest that these tests should be performed but not required during the HEA.

What follows are more specific comments to the various sections of proposed guidelines.

Document P1: Proposed Changes to Home Performance with Energy Star Quality Assurance Requirements.

The National Grid model uses one contractor for implementation, the contractor follows the QA protocols of BPI as a BPI Accredited organization. This ensures consistent quality and delivery of the program. We feel that the proposed approach and changes are clear and reasonable. We would recommend that the "Satisfaction Survey" be Recommended not Required as we discontinued the satisfaction survey in Massachusetts as customers were pleased with our program.

Document P2: Proposed Minimum Home Performance with ENERGY STAR Sponsor Reporting Requirements.

Page 2 bullet 2: National Grid in both Massachusetts and Rhode Island has only one contractor. This model continues to be successful and delivers quality services to our customers. This model should be available to other HPwES sponsors.

Document P3: Proposed guidelines for a Home Performance with Energy Star Comprehensive Home Assessment.

National Grid's current program model and approach has resulted in significant home energy improvements and has done so in a cost effective manner following the requirements of HPrES whenever major shell tightening retrofits are implemented. National Grid's Programs not only minimize confusion in the market while protecting the integrity of the HPwES brand, they also protect the integrity of National Grid and our commitment to our customers' efficient energy use and safety. National Grid has been offering these energy efficiency programs to our customers for twenty years.

Section B. Utility Bill Review & Analysis:

This is typically already done if the utility information is available. We are in agreement that this is an important aspect of any assessment as it is the only true measure of actual energy usage that helps quantify the opportunity for, and magnitude of, available savings from implementing improvements. We suggest that this analysis be strongly "recommended", but from a practical perspective, not made as a "requirement" as many customers do not keep accurate fossil fuel records.

Section F.3: Radon Test Recommendation if Home is in a High Radon Area:

National Grid believes that this goes beyond the scope of a historic energy conservation program's focus. We would not be against providing customers with a general brochure on Radon risks, testing and remediation.

HOME PERFORMANCE with ENERGY STAR COMPREHENSIVE HOME ASSESSMENT (CHA) GUIDELINES:

Section A 2b: Allergies are not generally addressed as part of a customer interview.

Section A 2d: Swimming pools are not generally addressed except as part of educational usage related to high bill concerns. Other parts of the country may have a greater need for this information.

Section A 3f: Smoke alarms and CO detectors are governed by state regulations. We make sure that CO detectors are present for any home in which we do shell work as required by the BPI technical standards.

Section C: All items noted in this section are addressed but not all existing conditions are "recorded". For example we would evaluate the refrigerator and record type and age but not overall condition. Data is not universally recorded for appliances like washers, dryers, dishwashers, etc., although their general age, efficiency, and the benefits of upgrading are discussed.

Section D,1d: House orientation and screening for renewable technologies is not currently done. We would suggest making this a Recommendation not a Requirement.

Section D,3c&d: Window and door inspections are part of the general assessment but not to the level of detail indicated. Windows and doors are not catalogued by number, type, size or orientation. General recommendations for maintenance or potential upgrades are made as warranted. Section 3.c. Window Inspection should be just that and inspection. Measuring windows appears to be a requirement that would prolong the HEA and not provide any valuable information for the homeowner. We would suggest not making this a Requirement.

Section D, 4a: We recommend that blower door tests should not be required at the time of the HEA , but instead required at the time of implementation. Full visual inspections as noted in section D, 4b should be part of the HEA.

Section E, 1c: Steady state efficiency tests should be performed only when requested by the homeowner not as a requirement during the HEA. See Section F: General below.

Section E, 1e: Not specifically done, if there was blockage there would be signs of a leak at some point that would be noted as observed.

Section E, 3a i & iii: These should not be required as part of the HEA evaluation. This is an HVAC company type of service.

Section E, 3b: Other than a visual evaluation of the ductwork for concerns, diagnostic testing of ducts should not be performed at the HEA. We suggest not making this a requirement at the time of the HEA.

Section E, 3c: Visual check of distribution system as it relates to customer comfort concerns should be required as part of the HEA.. No specific check for air trapped radiators should be required. Checking for possible asbestos containing material is currently performed during the HEA.

Section E, 5a: The evaluation of the “design” of the mechanical vent fans is not possible in all cases and should be Recommended not Required. Evaluation of mechanical ventilation is associated with moisture assessment of the building and as it relates to contribution to combustion zone depressurization issues should be performed.

Section F, General Comment: Complete combustion safety testing to the BPI Technical Standards is conducted at the HEA only if shell tightening work is proposed.

Section F, 1ci: Presently, health and safety tests are all performed as described, but at the time of weatherization work and should not be required during the HEA. All BPI protocols are followed when performed.

Section F, 1cii: Verifying that a pressure relief valve operates should only be done if the specialist believes that operation of the valve will be safe and pose no scalding hazard and, thus, should not be Required during the HEA. If vent piping is not properly configured or any corrosion is present on the valve or its fittings, the specialist should not operate the valve.

Section F, 1dii: A heat exchanger leakage test should be Recommended not Required. A visual inspection of flame pattern when blower kicks on can be performed as this is a possible indicator of heat exchanger failure but this is not a definitive test for a potential failure.

Section G, 1b: Estimated or actual costs, savings, and simple paybacks are provided for most energy efficiency improvements recommended but not for all. Some measures provide small savings and are very difficult to quantify. Our experienced program vendors know which

prescriptive measures are cost-effective without any calculations. Some examples are CFL's, showerheads and aerators. In most cases National Grid pays the full price for these measures which are installed during the HEA.

Document P4: Proposed Home Performance with Energy Star Certificate of Completion

P4 General: National Grid does not have a major concern if it is instituted. We could adapt our databases to incorporate most of you required fields. However it is estimated that this effort will add a cost of \$5-\$7 per COC. We would suggest that the "Home Performance Results Achieved:" only report the estimated units saved not the before and after usage.

We have a couple of questions regarding the COC.

- When would this be required, only when major measure shell work is completed or for any program measure? The sample COC includes appliance, windows, and lighting. Would a COC need to be issued if a customer installed windows and received a rebate?
- Customers routinely implement measures at different times (i.e. CFL.s installed at HEA, insulation work at one point, maybe replace a heating system at a different date). Would a new COC need to be provided after each event thus adding additional costs? As noted above would the "Home Performance Results Achieved:" need to be adjusted each time a COC is issued for another installed measure? This would be onerous.

Yours truly,

Bob O'Brien & Jerry Hanna