Please submit written comments to energystarhomes@energystar.gov no later than November 15, 2021 using this template. Please note that all submitted comments will be posted on the ENERGY STAR website.

**Organization Name:** [Add organization name]

**Respondent Last Name:** [Add last name]

**Respondent First Name:** [Add first name]

**Comments:**

**General**

[Add comments]

**National Transition to SFNH v3.1/MFNC v1.1**

1. Are there any available data or analyses to indicate that a national transition to SFNH Version 3.1 and MFNC Version 1.1 is not warranted at this time?

[Add comments]

1. Will the proposed date of January 1, 2023 (based on permit date) provide partners with sufficient time to prepare for the transition to SFNH Version 3.1 and MFNC Version 1.1?

[Add comments]

1. Do you have additional general feedback on this topic?

[Add comments]

**Introduction of National SFNH Version 3.2 and MFNC Version 1.2 Program Requirements**

1. Are there any available data or analyses to indicate that EPA’s proposed SFNH Version 3.2 and MFNC Version 1.2 program requirements are not warranted or that the proposed efficiency levels are not achievable or cost-effective?

[Add comments]

1. Is the proposed more stringent thermal backstop for SFNH Version 3.2 and MFNC Version 1.2, aligned with the 2021 IECC, appropriate and achievable?

[Add comments]

1. For SFNH Version 3.2, is the proposed more stringent alternative backstop for homes with low infiltration, defined as ≤ 115% of the total UA resulting from the U-factors in the 2021 IECC, appropriate and achievable? Should this alternative backstop be restructured to better target the types of homes most likely to use it (e.g., homes with ducts in an unvented attic)?

[Add comments]

1. Should EPA maintain its previous policy of requiring that the new version of the program be used to certify homes and apartments permitted one year after the date of implementation of the state’s new code for the proposed SFNH Version 3.2 and MFNC Version 1.2 program requirements?

[Add comments]

1. In the new MFNC Reference Design, EPA is proposing to include a 1.2 EF water heater. This efficiency level falls between what is available for electric tank products and heat pump products and was selected to require apartments with electric water heating to install heat pump water heaters when using the Prescriptive Path, while not making it prohibitively difficult to achieve the ERI target for those using the ERI Path. Is this an appropriate level of water heater efficiency for EPA to include in the proposed new MFNC Reference Design?

[Add comments]

1. Do you have additional general feedback on this topic?

[Add comments]

**Introduction of New Certification Label to Accelerate Construction of Next Generation of Homes & Apts.**

**General**

1. Do you have general feedback on this topic?

[Add comments]

**Energy Efficiency Prerequisite**

1. Are EPA’s proposed energy efficiency requirements at an appropriate level for the new certification?

[Add comments]

**ENERGY STAR Certified Connected Heat Pumps**

1. EPA is proposing that all installed heat pumps must use the HVAC Grading Track and achieve Grade I for all elements. Is mandatory HVAC grading and achieving Grade I in homes an appropriate requirement for the new certification?

[Add comments]

1. EPA is proposing that all installed heat pumps must meet EPA’s ‘connected’ criteria or use an ENERGY STAR smart thermostat. Are these connected options appropriate requirements?

[Add comments]

1. EPA is not proposing to include space conditioning or connected requirements for non-dwelling unit spaces in multifamily buildings. Is this an appropriate and advisable exemption?

[Add comments]

1. EPA is proposing that cold climate heat pumps be required in Climate Zones 5-8. Are these the most appropriate areas for requiring these systems? Should any Climate Zones be added or any eliminated?

[Add comments]

**ENERGY STAR Certified Heat Pump Water Heaters**

1. EPA is proposing minimum tank size requirements to help ensure that the heat pump is used as the primary water heating source, rather than the electric resistance backup coil. Is this advisable, and are the proposed tank sizes appropriate?

[Add comments]

1. EPA is proposing that heat pumps installed in occupiable space have a sone rating of ≤55 dBA. Is this an appropriate threshold?

[Add comments]

1. EPA is proposing that heat pump water heaters will be mandatory to earn the new certification for all types of new construction, including multifamily. Should EPA consider allowing conventional electric water heaters while the market develops new heat pump water heater solutions?

[Add comments]

**Induction/Electric Cooking**

1. EPA is proposing an exemption from the certification requirement for induction cooktops and ranges in government-subsidized affordable housing projects, where conventional electric cooktops will be allowed as an alternative. Is this allowance appropriate and advisable for affordable housing?

[Add comments]

1. Should EPA also consider allowing conventional electric cooktops in market-rate housing as an alternative to induction?

[Add comments]

**Electric Vehicle Charging Capability**

1. Are EPA’s proposed requirements for private EV-Ready spaces and/or installed EV chargers and EV-Capable parking spaces appropriate?

[Add comments]

1. EPA is proposing to cap the number of required EV-chargers for a development at five (5). Is this an advisable limit?

[Add comments]

1. Some concern has been expressed that the addition of an EV charging circuit would require a costly upgrade to 400-amp service. EPA believes this will be a relatively rare occurrence (and may become even rarer with emerging tech solutions that could eliminate the need for upgrades). Is EPA underestimating the frequency with which this might occur, and if so, should the requirement be changed?

[Add comments]

1. EPA is not proposing to relax the EV-Ready or EV-Charging requirements for government-subsidized affordable housing. Should EPA consider setting alternative EV charging infrastructure requirements (or have no EV requirements) for affordable housing?

[Add comments]