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Subject: MO HPwES Comments on ENERGY STAR Proposals

Dale-

My local implementers will send their own comments on the proposed changes.  
Below are my sponsor comments on the proposed changes:

#### P1 Comments

The rate of 3% minimum seems a bit low to me. I would recommend that for the first 50 jobs from a contractor that the rate is 10% or higher. Once the contractor has achieved a good record for those 50 jobs then reduce the rate to 5%. I like the minimum of one per quarter for low production contractors. Another additional possibility is to mandate that the first 5 jobs for each contractor get QA inspections to help make sure they "get it." One question I have is about who would be eligible to perform the inspections or reviews. Will EPA place any requirement on that, such as BPI certification? Or is that a sponsor call?

#### P2 Comments

The proposed reporting requirement changes are acceptable, but seem lacking in much substance regarding energy savings. If those metrics work for EPA, then OK. MO HPwES will strive to collect data about energy savings as well, both estimated and actual. The changes and timeframes seem reasonable to me.

#### P3 Comments

What do we call it? I am fine with CHA and my local implementers can live with that, too. Utility Bill Review: This should be strongly recommended but should not be mandatory but I expect is already done by those who truly do comprehensive work. We are going to require that the contractor have the homeowner sign a utility bill info release form so that we can perform pre and post comparison after 12 months. I think it may help to have a form for the contractors to give to the owners ahead of time so they can try to fill out usage data for each type of energy source. With my limited experience in the program I am unsure of how contractors will respond.

#### Radon Test.

Yes, there should be an education requirement for areas that have known Radon levels of 2 and higher. A fact sheet from EPA would be a good start. Our QA could then include a check with the homeowner to make sure this was addressed. This is another possible business opportunity for our contractors.

#### Duct Leakage and Air Flow Testing

Duct testing and air flow should be required unless the contractor can document why it is not necessary. For example, "Homeowner has no comfort issues and all ductwork is in the conditioned space." Without more experience in the various testing methods, I feel unable to comment on the question of alternative testing. But, generally, if they are proven by the industry to work, then I like flexibility.

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