

Comment Database for Proposal to Pilot Test a Home Performance with ENERGY STAR Contractor Partnership <i>Italics denote comment was made on 1/7/09 conference call.</i>			
Organization	Topic	Comment/Question	EPA/DOE Response
CEE	Training	Any training materials should be vetted by all stakeholders.	DOE plans to use off-the-shelf training materials that were used for the Maryland Home Performance with ENERGY STAR program.
CEE	Training	If pilot purpose is to test the validity of trainings, DOE/EPA may wish to go without cost-sharing.	This is not the purpose of the pilot. The training was successful in Maryland and many contractors are willing to pay for it. DOE is offering the cost share for the training based on jobs reported. This may be the only financial incentive for contractors to report jobs.
CEE	Training	If training is successful, training materials should be made public on ENERGY STAR Web site.	We do not plan to make the training available on the ENERGY STAR web site.
Arlington County	Training	Requirement for training cost reimbursement should be trimmed to 10-12 projects from 20. That would be a more "reassuring target" given market challenges including: few certified local auditors, the likelihood the applicant pool will draw from allied trades, and the uncertainty of the pilot's sustainability.	Because of our legal authority to collect information we must limit the pilot to 9 contractors initially, but we anticipate approval to exceed this limit by November. We believe that contractors need to complete at least 20 projects before they will start to work out the administrative requirements of the program. We also believe their business should be committed to doing home performance work.
Efficiency Maine	Software	Can EPA/DOE commit to one or more standards for software?	Yes, the proposed plan will accept a Home Energy Rating or software approved for use by DOE's Weatherization Assistance Program. We will also consider the role of BESTEST-EX once it is finished.
PSD	Software	DOE/EPA could use a published XML standard for data submission as an in-progress outcome of the pilot	Yes, we agree. The quality assurance infrastruce will need to address this.
PSD	Software	Does DOE/EPA really want to be in the business of reviewing software approaches?	No, but some review process needs to be established by EPA, DOE or other third-party. We will consider the role of BESTEST-EX once it is finished.
CEE	Software	Every software package should meet 3 criteria: (1) must be capable of incorporating regional variation if intent is to expand pilot, otherwise results could be irrelevant to other regions; (2) software should deliver consistent, repeatable results to ensure good information is getting to consumers; (3) be capable of measuring plug loads and occupant behavior	Yes, we agree. For the pilot we will be using existing softare approval processes to save time and money. These suggestions could be incorporated into existing processes after the pilot such as BESTEST-EX.
Efficiency Maine	Software	If there's agreement on energy calculation software, it MUST have really good user documentation.	Yes, we agree. For the pilot we will be using existing softare approval processes to save time and money. These suggestions could be incorporated into existing processes after the pilot.
PSD	Software	Should clarify what we mean by WAP standards.	Any software approved for use by the Weatherization Assistance Program at DOE
ECA	Software	Software usually overestimates savings. Why are you requiring it?	For the pilot we have defined HPwES as a package of improvements that saves at least 20% on total energy use. Some method needs to be approved for estimating the 20% savings. We decided to use two existing approaches that are commonly used and have national support. Any method to predict future energy savings will be inaccurate. Methods that use actual energy use are preferred and DOE has developed BESTEST-EX to help improve energy simulation models and provide a test for evaluating models that use actual energy use to improve predictions.
PSD	Software	Thank you for not specing the software.	We have intentionally avoided specifying a specific software.
PSD	Software	To prevent gaming of savings results, calibration to utility bills is a great start. BEST-TEST is working on this, but for now it might be enough to reference this. EPA could also point users to their bill disaggregation tool. Raters should be required to do this because rating tends to exaggerate heating and cooling loads in mild climates.	Good idea. We will recommend in sales training. We will also consider the role of BESTEST-EX when it is finished.
PA DEP	QA	Define 3 rd party orgs? Can there be multiple 3 rd party contractors for regions, or one for the whole country?	For the pilot we are considering one organization to work out the standards, protocols and administrative details. However, multiple organizations could be involved in routine activities. If the pilot is successful and expanded nationally we will need multiple organizations to implement day-to-day activities. EPA and DOE do not intend to select one national implementation contractor for HPwES. We do intend to establish minimum participation requirements for contractors and for quality assurance infrastructure. If the pilot is successful, and an appropriate Quality Assuramce framework is established, 3rd party organizations may be able to compete to provide QA services. The pilot will help define the roles and responsibilities for 3rd party organizations.
Efficiency Maine	QA	EPA/DOE should establish baseline QA data collection/scripts and homeowner survey/scripts.	Yes, we agree. The quality assurance infrastruce will need to address this.
PSD	QA	What if instead of procurement, DOE/EPA made a market of QA, put out an RFQ and established a list? Then QA providers would be recruiting and investing in contractors in NoVa.	EPA and DOE wants to create a sustainable market for QA activities. This type of arrangement could work after we establish the quality assurance infrastructure during the pilot.
CSG	QA	Will EPA/DOE be selected providers or putting out RFP?	EPA posted a sources sought notice and statement of work. http://www.epa.gov/oam/hpod/index.htm#sources This is not an RFP. EPA released a solicitation on July 7, 2009 requesting proposals by August 6, 2009 for a third-party organization to perform this work for the pilot. Information is available at http://www.epa.gov/oamhpod1/admin_placement/0900167/index.htm
Dominion	Program Requirements	20 jobs is difficult to achieve for smaller companies - seems biased toward larger firms (not necessarily a bad thing)	In the pilot we need to test QA administration and use of a performance metric. It is easier working with fewer contractors that perform more jobs than many contractors that perform few jobs. The more contractors the more complicated the administration. We want to workout the challenges in the administration. 20 jobs seemed to be a reasonable number. We will consider changing it to 10 jobs.
GRU	Program Requirements	For training reiumbursement, you could use a tiered approach (\$100 for each job reported).	We will consider.
Dominion	Program Requirements	How did you determine the threshold of 20 qualified projects to be a HP contractor? Why 20?	In the pilot we need to test QA administration and use of a performance metric. It is easier working with fewer contractors that perform more jobs than many contractors that perform few jobs. The more contractors the more complicated the administration. We want to workout the challenges in the administration. 20 jobs seemed to be a reasonable number. We expect each company to perform at least 20 jobs.
Arlington County	Program Requirements	Requirement of 20 completed jobs each year, including the first year, may be too daunting to contractors and unrealistic, particularly given uncertainties surrounding incentives, financing, and the economic environment. Requirement should be trimmed to 10 - 12 jobs in the first year.	In the pilot we need to test QA administration and use of a performance metric. It is easier working with fewer contractors that perform more jobs than many contractors that perform few jobs. The more contractors the more complicated the administration. We want to workout the challenges in the administration. 20 jobs seemed to be a reasonable number. We expect each company to perform at least 20 jobs.
Efficiency Maine	Program Protocols	"Reporting" protocols need to be spelled out in painstaking detail--to better facilitate the whole back end of the program. Processes and forms should be explicit	Yes, we agree. The quality assurance infrastruce will need to address this.
Efficiency Maine	Program Design	Pilot is good in that it eliminates middle layers of program administration and established consistent marketing messaging across all HPwES activities.	Yes, we agree.

Efficiency Maine	Program Design	Like the redesign, even though it eliminates the role of an administrator.	There will still be a role for program administrators and program sponsors. If the pilot is successful we hope to transfer the quality assurance responsibilities to an independent third-party.
Efficiency Maine	Marketing	Broadbrush marketing based on advertising isn't enough—you must go further, deeper; it takes time to develop relationships with the press, legislature and get the right story told. This takes LOTS of on-the-ground personal interaction with orgs, govts, everyone.	Yes, we agree. We expect many of these actions are necessary.
WECC	Location	Being close to national headquarters will allow EPA/DOE to showcase on a national scale.	We don't plan any national press for the pilot. If it is successful we will consider.
WECC	Location	NOVA is good selection because wealth and (feeling of) social responsibility will help sell jobs. Has best chance to take off here.	Yes, we agree that economic conditions are more favorable in Northern Virginia than in many other markets and should help the pilot be successful, however energy rates are lower than average.
CEE	Location	NoVa is wealthier than most of the country. If pilot is meant to simulate rest of country, NoVa is poor location choice. On the other hand, if pilot is meant to remove financial constraints, it is a good location.	The economic conditions are more favorable in Northern Virginia than in many other markets and should help the pilot be successful. We do not expect this pilot to stimulate activities in other markets.
SENCON	Location	Requests that pilot be opened statewide. Expanding to Hampton Roads would allow SENCON would lend them credibility for what they've been doing (training, HP work, etc.) and they could easily insert HPWES language into their print and radio ads.	We do not plan to expand the pilot at this time. We will reconsider after one year.
CEE	Impact on sponsor-model.	Identify and articulate their planned next steps if pilot is deemed successful.	If the pilot is successful EPA and DOE will consider adopting the HPWES partnership agreement for contractors and revising the HPWES partnership agreement for program sponsors. Minimum contractor participation requirements and quality assurance would be established in the partnership agreement for contractors. The revised partnership for program sponsors would focus on program promotion instead of program infrastructure development. Stakeholders would be given an opportunity to comment on the proposed changes before a decision is made.
CEE	Impact on sponsor-model.	If pilot is expanded, how will current sponsors be impacted?	Current sponsors would need to sign a new partnership agreement and meet the new requirements. Minimum contractor participation requirements and quality assurance requirements would be set by EPA and DOE. HPWES would be defined as a package of improvements that meets a minimum energy saving threshold. We anticipate that this change would reduce the burden on program sponsors and make implementation easier and more consistent nationally. Program sponsors would still have flexibility to set incentives, market their program, and add specific requirements. An independent third-party would be responsible for quality assurance.
CEE	Impact on sponsor-model.	If training is successful, will DOE continued cost share in a national roll-out? Will existing program sponsors be eligible?	It is not DOE's intent to provide a cost-share for training beyond the pilot.
CEE	Impact on sponsor-model.	Will pilot outcomes inform future changes in existing national program? If so, pilot should take place where conditions are representative of a nation as a whole.	Yes the pilot outcome will inform future changes to the national program. Stakeholders will have an opportunity to comment on future proposed changes to the national program.
CBPCA	HP Job Definition	20% is such a low bar that contractors won't bother testing because it will be an "unnecessary" cost.	We can set the goal at 25% or 30%, but feedback from the Weatherization Assistance Program suggested that 25% is too difficult in many homes. It may not be cost-effective.
CEE	HP Job Definition	20% target reduction could encourage implementing just that level of energy savings and not more. It would be helpful for this pilot to inform other program as to whether setting targets is harmful or helpful	Yes, the pilot will test the implications of using a performance target. We believe that to achieve a total energy use reduction of 20% will require more than one measure in most homes.
WECC	HP Job Definition	Because there are no incentives directly tied to HP, the only "value" is the third party QA, 20% savings pledge, and performance testing—which are all or none proposition.	Yes, that is the proposition. We do believe that some type of incentive is needed to motivate many homeowners to respond. We will explore if local utilities or governments can provide an incentive to homeowners.
CBPCA	HP Job Definition	Deemed savings would work just as well, particularly because we aren't offering incentives, which will make it difficult to get contractors to comply with reporting requirements—the logo isn't powerful enough to get contractors to report.	Deemed savings could make this easier for the contractor. We decided to use existing approaches for verifying the energy savings. We will consider this in the future.
CEE	HP Job Definition	Further explain basis for setting single national definition of Home Performance.	HPWES as a brand needs to have a consistent meaning for homeowners across the country. Consistency reduces consumer confusion, makes national campaigns possible, and allows a scalable model to develop.
CBPCA	HP Job Definition	Having a clear metric like 20% is good.	Defining a comprehensive assessment or comprehensive job is problematic. Instead, we picked a performance metric that will typically require more than one measure to achieve.
WECC	HP Job Definition	Homeowners could miss out on 3rd-party QA and testing if their home is not conducive to 20% opportunities.	Yes. Only a package of improvements that saves at least 20% qualifies as HPWES. However, the contractors that participate will need to meet program eligibility requirements.
CEE	HP Job Definition	How was 20% energy savings definition chosen? This could be easily surpassed or unachievable.	Defining a comprehensive assessment or comprehensive job is problematic. Instead, we picked a performance metric that will typically require more than one measure to achieve.
WECC	HP Job Definition	IF I was a contractor, I'd do a quick survey of bills and interview do determine if HP was correct path. Because there are hoops associated with HPWES jobs, contractor will likely pick and choose which ones are going to be HPWES	Yes, that is acceptable and prudent.
CBPCA	HP Job Definition	Redefining HP job as 20% savings is a huge step down; even simple retrofits without any testing (new fridge, CFLs, and some insulation without air sealing) can achieve that.	Yes, this could happen, but it is not our intent. We will consider requiring savings to come from envelope and HVAC improvements first, unless they already meet the ES homes BOP levels.
WECC	HP Job Definition	The 20% number could be a point of contention if homeowners don't "get" HP contractors--how are they different than other that say you can get 30, 40, or 50% savings (in the eyes of the homeowners)?	There are windows contractors claiming 50% savings today. It is a reality of a competitive market. Contractors will need to deliver on the promise. If they don't their customers may complain.
WECC	HP Job Definition	There are problems for contractors with the 20% number...they will have to back in an extra 5% savings to be sure to hit the number and they'll have to do performance testing to know how--both of which cost money and mean a greater portion of homeowners will not bite.	Yes, that is acceptable and prudent. We hope contractors will offer proposals that save 25%, 30% or even 50%.
WECC	General Purpose	Appreciates the "bottom-up" driven HP model (getting the market providers to sell the program); it allows HPWES to spring forth in many markets should NOVA succeed.	That is our intent.
CEE	General Purpose	Clarify objectives of the pilot, specifically so stakeholders understand what is being tested. For example, is purpose to: increasing program outreach effectiveness, increasing measures per homeowner, testing financing approaches, assessing energy savings, etc.?	Yes, we can clarify. We will prepare a revised plan and send to all stakeholders that addresses the comments. We will also have another webcast to explain how we addressed the comments.
PSD	General Purpose	DOE/EPA can't solve all in one pilot, but pilot is good because it needs a reference-able tool. With stimulus package, we need to establish these tools for massive scale.	We agree.
WECC	General Purpose	HPWES should ultimately be focused on contractor best practices and building science, with the intent to get out of the contractors way.	Yes, we are working toward this. However, HPWES is a partnership. Program administrators need to give an account for the public resources spent. Contractors benefit from this program and need to provide information. Both parties have needs.
WECC	General Purpose	This pilot seems like a test of whether building science can be marketed.	Building Science will be an important part of work performed, but our intention is to test a QA model and marketing a performance metric.
CBPCA	General Purpose	What makes this approach easier for contractors than the existing sponsored model? How can contractors compete against non-participating contractors who may also promise the same savings?	The model being tested in the pilot is intended to make program administration easier by removing the responsibility for QA. It may also reduce QA burden on contractors. We can not stop competition. We can try to create an effective differentiator.

CBPCA	General Purpose	What's the point of switching the sponsor's responsibilities to EPA/DOE? DOE/EPA should reconsider the pilot model and focus on one that can scale up, such as "HPwES Lite," which gets the low hanging fruit, costs \$5-8K and still gets 20% savings, but doesn't have combustion safety implications.	The goal is to test a model we can scale up in many locations. A sponsor would not be required to provide quality assurance, but utility and state sponsors will still be needed to offer financing or incentives to homeowners. Twenty percent is the minimum savings goal. Combustion safety and other health and safety issues are always important. There are other program approaches that can achieve what you suggest. However, they are not HPwES.
PSD	Financing	How does DOE/EPA see loans fitting into this?	We plan to ask each contractor (during sales training) about financing and help them locate a lender willing to work with them. We will present options that exist.
Efficiency Maine	Evaluation	During evaluation phase, she'd like to see the market segmented by good HP opportunities across the country.	For the pilot we evaluated basic market conditions in several metro areas around the country. We can share this information and consider in the final evaluation.
PA DEP	Evaluation	<i>Elaborate on how you will determine if market can support QA.</i>	The pilot will focus on defining a 3rd party quality assurance framework. First, we need to work out the administrative details of reporting and inspections that contractors will accept. Second, EPA and DOE needs to be confident that the Quality Assurance framework is adequate to protect the brand reputation. Third, the Quality Assurance framework needs to demonstrate real monetary value to contractors. We will assess the value contractors attribute to the ENERGY STAR brand, the HPwES certificates, access to HPwES resources, and other benefits (e.g., improving internal business processes) compared to the cost associated with the Quality Assurance framework. The Quality Assurance framework needs to provide interested stakeholders (e.g., financial institutions, local governments) with confidence that participating contractors can achieve the energy savings that the stakeholders require. Even if the pilot determines that contractors will not accept the full cost of participating within the Quality Assurance framework, the pilot can provide guidance on what incentive is needed. If the Quality Assurance framework meets EPA and DOE needs and most contractors like it we will formally propose to adopt the approach and move to revise the HPwES partnership agreement. There would be one agreement for energy efficiency program sponsors and one agreement for contractors. EPA and DOE would ask stakeholders to comment on the proposed changes before adopting the new partnership agreements.
CEE	Evaluation	Provide more detail on the evaluation methods that will be used, i.e., surveys, focus groups, etc.--CEE will convene Whole House and Evaluation Committees to provide specific evaluation input.	We would like to initiate a dialogue with CEE about evaluation methods. Our legal authority to collect information may limit some of these methods. We are pursuing the necessary approvals to conduct evaluations.
CEE	Evaluation	Recovery Act and other factors could be important success factors and any efforts to capture this effects would be helpful.	Yes, tax credits could have a positive effect. There could also be state or local incentives available. Incentives will be needed to motivate large numbers of homeowners to respond.
CEE	Evaluation	Success of pilot should be compared to success of existing programs.	The number of projects completed and energy saved are important metrics for the pilot, but the primary purpose of the pilot is to test whether the programmatic mechanisms for contractor partnership and quality assurance will be effective.
ECA	Evaluation	<i>To monitor energy savings, there can just be a small line item that contractors include on the contract - weatherization programs can get almost 100% of homeowners to agree.</i>	We would like to collect this information. We need to check our legal authority to collect this information.