

Comments from a Builder in Harrisburg, Pennsylvania

1. We are keenly aware of the constant need for improvement and in fact we have improved the specs and quality of our home construction annually (sometimes semi-annually) for each of our 33 years in business. However, Pennsylvania is not a stronghold for the ES Program and at times, we question if enough has been done to promote. We can not justify the ES Program on the basis of increased sales or recognition over and above our non-ENERGY STAR competition. A quick look at the Builders Chart for Pennsylvania on the EPA Website tells the story of ES in Pennsylvania. However, we choose to be a 100% ES Builder because we feel it is "the right way to build a home." We started in business in 1972 right before the Energy Crisis and have carried on with Energy Efficiency as our mantle ever since. Over the years, we find that many people have long forgotten those times. It is often that house location, price, size, design features, even color, weigh heavier in the buying decision than energy efficiency.
2. With ES New Home Construction, it seems appropriate that the emphasis should be on Building Techniques, Processes, and Materials. The "Customer" often controls minor items such as appliances, lighting fixtures, etc., and making the Builder the enforcer/screener for ES "manufactured items" doesn't work well in the "customer-client" home buying setting. Example, the Dishwasher with a special "potscrubber" feature (or whatever) may not be ES qualified but that's the one the customer wants in his/her house. The water heater that meets the needs of the household and is large enough and quick enough for the customer may not be ES qualified. If a customer has a dissatisfaction with an appliances/equipment after the sale, they don't accept "ES qualified" and energy conservation as an acceptable answer.
3. If the cost of inspecting, verifying, rating, and certifying our ES Home is increased, that is less money we have to spend on the ES requirements themselves and is it not easily recognized by the consumer as a value. In the extreme, if new procedures and requirements would increase these costs significantly the (Pennsylvania) consumer is not going to pay for it in the price of their new home.

An argument could be made that given the total number of ES Homes built each year in Pennsylvania, the Pennsylvania consumer isn't even willing to pay for the current ES requirements. The costs of cost of inspecting, verifying, rating, and certifying our ES Homes must be kept simple, flexible, and straight-forward.

In our case, the home rater is a small business. If his/her costs are significantly increased with new mandatory, costly accreditations and more verification and certification work on the home, the program is jeopardized.

"Grandfathering" of existing ES Raters/Certifiers that EPA has recognized as being competent in the past might be considered. Also, greater reliance on test results and performance of the home might offset the need for extensive checks and verification that can be labor intensive.

4. We have not had the time to research all of proposed ES changes.
 - a) We have no concern with Windows and HVAC Equipment, two of the larger components in the program.
 - b) We haven't had much success with Programmable Thermostats in the past since their sophistication often exceeds the typical homeowners ability or desire to study them and learn how to use them properly.

c) Ductwork leakage would have to involve our HVAC Contractor and we have not had time to research it with them.

d) The envelope standard seems like a radical departure from the current .50 ac/h. Don't think it will be a significant problem for us but we've had some between 35-50 over the years. We assume those will now result in extra work or costs to resolve. More people express concern about homes being too tight rather than not tight enough.

e) Water heater is a tricky issue for the Builder. Homebuyers get upset when they don't have enough hot water or if it doesn't get produced fast enough. Knowing your water heater is ES qualified isn't the first thing that comes to mind with a cold shower. We haven't had enough time to research the new water heater requirements to know if it's a problem. In the past, many of the appliances such as water heaters and dishwashers that "get the job done" well were not ES qualified. Consumers tend not to think of energy conservation when it comes to clean dishes or hot water.

f) Lighting and Appliances is more of a consumer issue and preference. We haven't had enough time to research the new requirements to know if it's a problem. Perhaps it's no big deal but in any event it's another little special item to track and note and that in itself adds to basic costs and expenses. We're not an appliance and lighting dealer but rather a Homebuilder. We'd prefer to focus on the proper construction of the house from any energy efficiency perspective and not get caught in the middle to appliances and light fixtures.

Perhaps the best accommodation for EPA, the ES Program and Builder Participants is to allow enough flexibility in the program for all these items to be incorporated into the program in some form but also allow them to be inter-changeable. That is, to obtain a final ES rating / certification through a cumulative point system as we understand to be the current situation. I understand most our homes far exceed the current minimum point requirement. If this aspect of the ES program is kept in place, will work best for many varied types of Builders, Consumers, and Building Markets.

Thank you, for the opportunity to comment on the ES program.
Sorry for the lengthy communication. We have enjoyed our 100% participation since 2000 and look forward to constructing Energy Efficient Homes in the future. If you have any questions, please don't hesitate to contact us.

There is a Pennsylvania Alternative to the Uniform Construction Code for Energy Efficiency that allows for the basement to be segregated from living areas and therefore not have to have insulated exterior basement walls. We use that alternative prescription in our construction and prefer not to insulate our concrete basement exterior walls. That is something that could get costly for the builder and can be easily done by the homeowner if and when they "stud-out" and finish their basements later.

Additional comments received:

Regarding Water Heaters (Gas):

We do a lot of gas homes with gas water heaters. Our HVAC Contractor who provides them and installs for us tells us that our 50 gal heater is .65 EF which is fine by the proposed guideline.

However, the 75 gal heater we install in larger homes (all homes with whirlpools) is .53 EF and that would not qualify. We're told that for 75 gal heaters, that .53 EF is a norm in the industry with various manufacturers. We started installing 75 gal in whirlpool homes when customers complained about running out of hot water in their whirlpools.

We are told that the annual energy difference/cost of operation between a .53 EF and a .65 EF heater (gas) is approximately \$144 vs \$177 (rather minimal; about \$2.75/month). The 75 gal heater is the “right product” to install in some of our homes.

Ironically, if we installed two (2) 50 gal heaters at more expense with more energy consumption, it might be compliant with the proposed ES 2006 revisions. They would both be rated at .50 EF but the two would take much more energy to operate than one 75 gal unit. That would be a “lose-lose” for everybody, including energy conservation.

Perhaps some allowance has to be made for different size heaters.

This sort of illustrates the difficulty in getting into appliances and capacity/feature issues with respect to energy ratings. We found similar circumstances in the past with other appliances. We can control how a house is built but can't always control the equipment and appliances. Capacity and Features issues are often dictated by home design and customer demands.