

Comments Received Via E-mail From Michael J. McCabe, Program Manager, Building Technologies Program, Energy Efficiency and Renewable Energy, Department of Energy

Essentially, staff commends you on your focus of the prescriptive path.
In particular:

- Right sizing of heating and cooling equipment and efficiency levels;
- Sealing of ducts;
- Improvement of the envelop;
- Use of ENERGY STAR windows;
- More efficient water heaters; and
- Use of ENERGY STAR lighting, ceiling fans and/or appliances.

However, we feel very strongly that you use the "Expanded" HERS score as the basis for qualifying home for the ENERGY STAR rating. The new ENERGY STAR should be based on a metric that includes all of the energy used in the home and provides consistency with other energy efficiency programs (e.g., tax credits, IECC, HERS, Building America, green homes, utility programs, etc.)

We have worked hard over the past several years to bring consistency to the various programs - a single weather map for the United States (the IECC map) and a common base case (the Building America reference house).

This

common base and cooperation between the various programs serves to strengthen and improve the credibility of all of the programs. By using a standard that is not linked to these other programs, weakens both the ENERGY STAR case and the other programs.

The RESNET proposal to use the "Expanded" HERS score of 84 will result in home designs that are roughly to the 30% wholehouse designs that the Building America teams are currently testing. This research will be completed at the end of FY 06 and could be used, without modification, by builders to attain the ENERGY STAR criteria.