



ENERGY SYSTEMS LABORATORY

**Texas Engineering Experiment Station
Texas A&M University System**

3581 TAMU
College Station, Texas 77843-3581

Mr. David Lee
Branch Chief, Energy Star Residential Branch
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Draft Proposed Specifications for ENERGY STAR Qualified Homes (2/8/05,
2/23/05)

Dear Mr. Lee:

Thank you for the opportunity to comment on the proposed changes to the Energy Star New Homes Program introduced at the RESNET Conference in San Antonio February 8, 2005 and opened for industry comment. We understand it is EPA's intent to release final guidelines in June, 2005 and to have the new guidelines go into effect January 1, 2006. Although we applaud the intent of implementing all of the changes (NAECA, RESNET, ENERGY STAR) at the same time, we believe that more time may be needed to resolve technical issues to ensure a successful transition.

The Energy Systems Laboratory agrees that the Energy Star benchmark should be very clear and that a thorough prescriptive basis could provide a solid approach to defining your standard. We also agree that Energy Star homes should be clearly code compliant, as well as achieving some level of performance that is clearly beyond the minimum code requirements. In the long run, a clear prescriptive basis may reduce confusion of how general claims of percentage savings apply to specific markets or state's implementation, and discussions on performance can be focused in a state or local forum. We believe that can help protect the value of the Energy Star brand.

Our Lab is involved with energy code implementation and home energy ratings in Texas. We have not recommended adoption of the 2004 IECC in part because it would decrease the stringency of code requirements for a large number of homes in our state. We are concerned that using the 2004 IECC as the base for Energy Star will cause unnecessary confusion in Texas. We also are receiving an increasing number of queries or expressions of industry concern over the effect of January '06 NAECA standards (specifically, minimum 13 SEER air conditioner) on builder costs, "above-code" equipment availability, and allowable trade-offs. We are concerned that interim confusion may cause some fall-off in builder participation. We are concerned that the points for non-construction items like appliances are not clearly separated, so that the

program could continue to be used as an alternative for code compliance. For this purpose, the points for Energy STAR appliances and lighting need to be treated separately.

Our Legislature is currently in session, and we will not know until June whether energy-performance-related bills may pass the Texas Legislature and be signed into law. We would therefore support a delay in publication and implementation dates for final guidelines until such time as technical issues are more fully addressed.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "W. Dan Turner".

W. Dan Turner, Ph. D., P.E.
Director