



Sam Rashkin  
Environmental Protection Agency  
ENERGY STAR Homes  
401 M Street S.W. (6202J)  
Washington, DC 20460

April 28, 2005

Re.: National Specifications for ENERGY STAR Qualified Homes

Dear Sam:

On behalf of the Northeast HERS Alliance, we would like to provide our comments regarding the 2006 ENERGY STAR Qualified Homes Specifications. We appreciate the opportunity to lend the collective voices from 34 active HERS providers, raters and programs who make up the membership of the Alliance. We also appreciate the time taken by your staff (Jonathan Passe) in working with us to better understand and explain your proposal.

We would like to provide four primary comments, which follow. In addition, we also support the "Response of Several Northeast Region ENERGY STAR Program Implementers" position paper (attached), which provides additional detail and suggestions. Our main comments include the following:

1. Fixed HERS Score: We feel strongly that, by not including a fixed HERS score as the threshold for ENERGY STAR qualification, we leave raters open to too much interpretation and gaming. RESNET has spent years tightening up the HERS reference home definition and aligning it with IECC. We suggest that EPA utilize that good work and determine a single or multiple minimum HERS scores as the ENERGY STAR qualifying threshold.
2. Expanded Score: With all of the changes that will be occurring in 2006, we feel that this is the time to introduce and utilize the "expanded HERS score." EPA, states, and programs are all focused on capturing as much of the energy savings as possible in homes, and the expanded score will help us do a much better job going after those savings than would the "classic score". In fact, with all of the changes occurring in 2006, the classic score will no longer be close to the current HERS score, and thus will only serve to add to the market confusion. In addition, the EPA is clearly sending a signal with this proposal that lighting and appliances are increasing in importance to the ENERGY STAR Qualified Homes program. While all of these changes are occurring, make the change to the expanded score now, knowing that is where the industry is already headed.

3. Minimum Requirements: We fully support most of the minimum requirements that you have suggest in the 2006 proposal. Given that we want to ensure that an ENERGY STAR Home is tight and does not have thermal or distribution deficiencies, we suggest the following minimum requirements be included for the performance/HERS path, as well as for the prescriptive/BOPs path:
  - a. Thermal Bypass Checklist;
  - b. Maximum house air leakage rate that matches the prescriptive standard; and
  - c. 10% (of house square footage) duct leakage.
  
4. Grandfathering: In order to allow a reasonable transition period and still maintain builder relationships, we feel strongly that a grandfathering period needs to be implemented. We suggest that currently participating builders have at least one year from January 2006 to complete the homes they have under construction to the current standards unless a state or program has a legal or contractual commitment to builders on specific properties that differs from this.

We look forward to continuing to work with you in support of ENERGY STAR Homes, and would be happy to answer any questions or provide clarification on any of our suggestions.

Sincerely,



Richard Faesy  
President

cc: Jonathan Passe, EPA

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