



NORTHWEST ENERGY EFFICIENCY ALLIANCE

April 29, 2004

Jonathan Passe
ENERGY STAR Homes Program
US Environmental Protection Agency
1200 Pennsylvania Ave. NW
6202
Washington, DC 20460

Dear Mr. Passe:

The ENERGY STAR Homes program represented by the Northwest Energy Efficiency Alliance, Washington State University Energy Extension Program, Idaho Energy Division, National Center for Appropriate Technology and Oregon Department of Energy thank you for the opportunity to comment on the 2006 ENERGY STAR Homes specifications. We would like to provide comments in addition to the CEE committee response.

Duct testing – While we support the duct testing requirements, we do not support the language requiring the tester be a RESNET certified rater. Integral to the Northwest's program is the transformation of the HVAC industry to routinely seal and test duct systems to ensure performance. Our certification for HVAC technicians requires a 2 day training on duct sealing and testing only, plus follow up quality control visits by a Regional Technical Forum approved organization. This requirement more than adequately ensures the rigor of our duct-testing program. We recommend the language be changed to "...a RESNET certified rater or equivalently certified technician."

Envelope testing – Currently the 2006 spec requires envelope testing by a RESNET certified rater. In Oregon and Washington prescriptive air sealing requirements equivalent to those required by the EPA are enforced by code. A formal study of new housing stock in 1998 indicated code compliance for air sealing was high in those two states. Our quality assurance process for the ENERGY STAR Homes Northwest program includes blower door testing to ensure the air sealing measures continue to be adhered to. Requiring verifier to test building envelope tightness on homes in Oregon and Washington will add little value in terms of energy savings or reduction of emissions and will institute a significant barrier in increased verification costs and upfront capital required for equipment. The Idaho and Montana data indicates that the EPA shell tightness measures are not met on code level homes. In these two states the verifiers are using blower door testing to substantiate the ENERGY STAR homes compliance. We recommend the language in the specs or at least an unpublished policy incorporate an exception to the rule of blower door testing for states substantiating compliance with the

air sealing requirements. In addition, while our certification of homes and training of verifiers is managed by approved RESNET providers, our verifiers are not RESNET certified raters except for Idaho. Again we recommend an equivalent to RESNET be allowed in the language.

Thermal bypass checklist – This requirement would add to the verification costs of the home, possibly requiring additional inspections to thoroughly complete the list. We recommend not adding this requirement for that reason. The Northwest program will ensure air-sealing measures continue to meet expectations through our QA process and training programs.

In addition we strongly urge you to include compact fluorescent light bulbs as an alternative to fixtures in your lighting and appliance spec. Our program is currently enforcing a lighting requirement that allows for fixtures or CFL's. We have found that distribution and product variety issues with regards to ENERGY STAR fixtures would limit program success.

Thank you again Jonathan for the opportunity to comment.

Regards,

Anne Brink
Project Manager
Residential New Construction