

Comments Via E-mail From Rita Ransom, Southwest Gas

Experience has shown that the best way to gain acceptance by builders is to work with them cooperatively by addressing their needs and the realities of their business. This has proven to be much more successful in gaining their cooperation and participation in Energy Star for homes. We believe this approach over the last few years has helped make the Southwest the premier location for numbers of Energy Star homes. It can work as well again for implementing new standards.

After reviewing the proposed standards, we offer the following comments:

1. Phase-in the new standards

We suggest that since the proposed changes are quite extreme, they be phased in gradually over a two to three year period, rather than implemented all at once. Builders would be much more willing to make a change or two at a time which would therefore likely increase the acceptance of the elevated standards. Phase-in would also minimize the potential impact of limited product availability from suppliers.

2. Extend the grandfather period

The proposed grandfather period of six months is too short. We recommend it be extended to a minimum of one year for each set of phased-in changes. Builders plan one to two years or more out and this longer phase-in would make the standards much more palatable and thereby potentially increase participation. Also, the longer grandfather period would accommodate projects that are built in phases. Builders would not want or be able to change construction standards in the middle of a project.

3. Availability of energy-efficient equipment

Given the housing boom and the prevalence of Energy Star builders in the Southwest, a sudden huge increase in demand for such products as 14 SEER air conditioning equipment and other energy efficient products would present a huge challenge to suppliers and builders alike. As stated in item #1, phase-in would reduce the impact of this issue.

Thanks for the opportunity to comment. Don't hesitate to contact me if you would like to discuss this further.