

# RECA

## RESPONSIBLE ENERGY CODES ALLIANCE

1200 18th Street, NW, Suite 900  
Washington, DC 20036

(PH) 202-339-6352  
(FAX) 202-342-0807

[www.RECA-codes.org](http://www.RECA-codes.org)

---

April 29, 2005

### VIA E-MAIL

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

RE: RECA Comments on Proposed Changes to the ENERGY STAR Homes Program

Dear Mr. Passe :

I am writing to provide comments on behalf of the Responsible Energy Codes Alliance regarding your proposed revision to the ENERGY STAR Homes criteria. In a nutshell, RECA strongly supports your adoption of the *2004 International Energy Conservation Code* as the foundation for your program.

Our organization supports adoption of the *IECC* nationwide and, with the improvements incorporated in the 2004 code, we believe that jurisdictions will view it even more positively than earlier versions. We have carefully evaluated this version of the code and are presently advocating its adoption. In particular, the code has been improved by the development of a single prescriptive path, with a reduced set of climate zones, simple, but reasonable envelope requirements, and no window area restrictions (but reasonable maximum limits on the performance of windows). These improvements promote ease of compliance without sacrificing energy efficiency. The advantages of this simple prescriptive path approach, although modified, are also captured by your proposal to establish a simplified prescriptive path for ENERGY STAR Homes. We think this is a very important new feature for your program.

We understand that the primary mission of the ENERGY STAR Homes program is to encourage homebuilders to build truly energy efficient homes, well beyond minimum code requirements, in order to qualify for the ENERGY STAR designation. However, the proposed modified guideline also has the potential to pave the way for and ease the adoption of the

**RECA**

**RESPONSIBLE ENERGY CODES ALLIANCE**  
1200 18th Street, NW, Suite 900  
Washington, DC 20036

mandatory energy code in many jurisdictions. While this is an ancillary benefit in terms of the ENERGY STAR program, it would be a significant step forward in the general promotion of energy efficient construction. In short, the adoption of the 2004 *IECC* requirements is an opportunity to provide leadership for the next set of energy code adoptions. This added benefit is not insignificant in its potential to save energy and reduce harmful air pollution. In this regard, while we understand specific components of your proposed prescriptive path for the new program are based on the 2004 *IECC* (like the insulation requirements), we also urge that you require that all homes, at minimum, exceed all of the requirements of the most recent version of the *IECC*. This will help ensure that homes built to the ENERGY STAR requirements meet the national model code.

We also agree with the proposed incorporation of ENERGY STAR products into the ENERGY STAR Homes program to the degree possible and urge that you consider requiring these products under the performance path as well. This course of action provides valuable cross-support for the other ENERGY STAR programs.

RECA is a broad-based consortium of energy efficiency professionals, product and equipment manufacturers, and trade associations with expertise in the adoption, implementation and enforcement of building energy codes nationwide. RECA is dedicated to improving the energy efficiency of homes throughout the U.S. through greater use of energy efficient practices and building products. RECA is administered by the Alliance to Save Energy, a non-profit coalition of business, government, environmental and consumer leaders that supports energy efficiency as a cost-effective energy resource under existing market conditions and advocates energy-efficiency policies that minimize costs to society and individual consumers. A list of our members is enclosed.

We appreciate the opportunity to provide our comments on this important program. Please contact me or Harry Misuriello at the Alliance to Save Energy (202-530-2214) if you have any questions or comments or would like us to provide further information.

Sincerely,



Eric M. DeVito  
THE RESPONSIBLE ENERGY CODES ALLIANCE

Enclosure

# RECA

**RESPONSIBLE ENERGY CODES ALLIANCE**

Alliance to Save Energy  
American Architectural Manufacturers Association  
American Chemistry Council  
American Council for an Energy Efficient Economy  
American Plastics Council  
Cardinal Glass Industries, Inc.  
CertainTeed Corporation  
Chemical Industry Council of Illinois  
Guardian Industries Corporation  
Hogan & Hartson LLP  
Johns Manville Corporation  
Knauf Fiber Glass  
Midwest Energy Efficiency Alliance  
National Fenestration Rating Council  
Northeast Energy Efficiency Partnerships, Inc.  
North American Insulation Manufacturers Association  
Owens Corning  
Pactiv Corporation  
Polyisocyanurate Insulation Manufacturers Association  
PPG Industries, Inc.  
Southwest Energy Efficiency Project