



May 20, 2005

Comments concerning the 2/8/05 DRAFT of the ENERGY STAR Qualified Homes National Specifications.

Acceptable:

1. 14 SEER A/C equipment – ES (Energy Star) standards must be higher than the national standards and since the national standard is being raised to 13 SEER, ES should be raised to 14 SEER.
2. Energy Star Qualified Thermostat – we are currently using ES Qualified T-stat.
3. Duct Leakage – we should not have too many troubles meeting the 4% floor area.
4. Envelope - <.35 ac/h is our current target.
5. Windows – We are using Andersen Wood windows which are ES Qualified.

Maybe Acceptable:

1. Water Heater – Local suppliers don't carry a gas .60 EF in the brand we use. There are other brands but they would cost \$40-\$75 more per water heater.

Not Acceptable:

1. Homes with windows in excess of 21% WFA – The Andersen window we use on all our homes has a SHGC of .33. When this is used in the equation:

$$\text{Required SHGC} = [.18/\text{WFA}] * [\text{ENERGY STAR SHGC}]$$

$$.33 = [.18/\text{WFA}] * [.40]$$

$$\text{WFA} = 21.8$$

Based on these calculations the most windows we can have in a house is 21.8% and we are using one of the best window available. Many of our houses exceed this and based on our understanding would not be compliant with the proposed ES requirements.

2. Lighting and Appliances – Currently we provide standard a refrigerator, stove, dishwasher, clothes washer and dryer. Of these appliances, only the dishwasher is ES rated. It would cost an additional \$470 to make our standard refrigerator one that is ES rated and much more than that for a clothes washer.

We don't feel it is a good idea to put ES lighting in bedrooms and living rooms because these fixtures are replaced by the homeowner more often than not. In many of our

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kitchens and exteriors, we use specialty lighting which is hand made and not energy star rated. That does not leave many locations to put the lighting.

3. Shower/Tub at Exterior Wall – we are not in favor of sheeting behind tubs. We feel that the stucco system is a sufficient air barrier at this location.
4. Attic Knee Walls – we are strongly opposed to the requirement to install an air barrier on the attic side of the insulated wall. This will be a very large expense and has questionable value.

Additional Requests:

1. Continue to allow proof of compliance by method of plan review and not solely a BOP type approach.

Thanks,

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