



## Washington Electric Cooperative, Inc.

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Bruce Harley, Technical Director  
CSG, Inc.  
577 Boulger Road  
Stamford, VT 05352

RE: EPA Energy Star specifications, response of several implementers  
18 April 2005

Dear Bruce:

The Washington Electric Cooperative Inc ("WEC") endorses the "Response of Several Northeast Region ENERGY STAR Implementers", to the EPA's National Specifications for ENERGY STAR Qualified Homes (draft dated 2/8/05).

WEC has served as sub-contractor to Efficiency Vermont since 2003 to deliver the Vermont Energy Star Homes (VESH) program to its members building new homes. WEC has been an EPA Utility Partner since 1994, and has promoted energy ratings and performance standards to our 10,000 members; our New Home program utilizing home energy ratings served as the utility model which evolved into the current VESH program.

We urge EPA to fully adopt the recommendations of the consensus position, and cite three which WEC believes are critical to the ENERGY STAR standard's continuing usefulness. The basic reference for ratings should be a fixed HERS score, although it may be different from the current 86 score. The adoption of minimum standards for envelope and duct tightness should include the thermal bypass inspection checklist recommended by the HERS implementers. And in the prescriptive path, the lighting recommendation should be expanded to allow compact fluorescent lights; we endorse as well as the prohibition on the "tankless" type of hot water heaters.

WEC appreciates the efforts made by the signatories to the "consensus position" and endorses their recommendations.

Sincerely,

A handwritten signature in black ink that reads "Bill Powell". The signature is written in a cursive, slightly slanted style.

William A. Powell, C.E.M.  
Director, Products and Services  
Washington Electric Co-op  
[www.washingtonelectric.coop](http://www.washingtonelectric.coop)