

**ENERGY STAR Certified Homes, Version 3.1
Program Requirements for Massachusetts
Comment Period Regarding Implementation Timeline & Integration with
Version 3.1 National Program Requirements**

This is a compilation of all comments received by EPA during the comment period ending March 07, 2014.

The following comments have been compiled verbatim from submitter emails. The Environmental Protection Agency is not responsible for any typographical errors or omissions.

Table of Contents

The BER.....	3
Conservation Services Group.....	4
ICF International.....	5



ENERGY STAR Certified Homes Proposed Requirements Comments

Organization Name: The BER

Respondent Last Name: McTaggart

Respondent First Name: Chris

Comments:

- Utilize the new v3.1 National Program Requirements in place of the v3.1 Massachusetts Program Requirements.

BER believes that the EPA should discontinue using a state-specific version of ENERGY STAR Homes v3.1 for MA. Instead, the National program guidelines should be used for consistency sake.

- Delay the implementation timeline in Massachusetts by requiring that homes permitted on or after January 1, 2015 be certified using the v3.1 National Program Requirements.

BER agrees that the EPA should delay the implementation timeline in MA per what is written above.



ENERGY STAR Certified Homes Proposed Requirements Comments

Organization Name: Conservation Services Group

Respondent Last Name: Schofield

Respondent First Name: Mike

Comments: I would like to register my objection to V3.1 MA because I believe that it will weaken the brand because of the public's confusion over different standards for states in the same climate zones. It is logical, but it balkanizes an otherwise cohesive program.



ENERGY STAR Certified Homes Proposed Requirements Comments

Organization Name: ICF International

Respondent Last Name: Hubbe

Respondent First Name: Peter

Comments: Here are my comments on V3.1. I know that there have been many people hours invested into this.

I think that having MA align with USA ENERGY STAR is a good idea.

I would encourage a HERS score of 60 across the board for simplicity.

I recommend that windows be ENERGY STAR, currently at 0.30. The ReBuild Western MA tornado recovery program used 0.28 for determining window efficiency incentives. There were many people who could not attain this incentive as windows come in so many varieties. Most projects were reaching ENREGY STAR at 0.30. I would encourage the wording to say ENERGY STAR windows, allowing the bar to be set and reset through that mechanism.

Doors opaque U value is not all that important. In reality air leakage around a door can easily be a bigger factor than U value. The addition of a storm door plays a significant role in reducing infiltration. There should be incentives for storm doors.