

Comments Via E-mail From Mike Glenn, Division of Housing and Community Development, State of Utah

The Utah Division of Housing and Community Development currently maintains over \$52 million in loans funds for single and multifamily affordable housing for Utah (1,258 units completed in FY05). Almost half of the funded projects in FY05 were renovations of existing units to achieve and maintain affordability. Our funding is derived from Utah legislatively appropriated funds and HUD HOME funds. We are anxious to see Energy Star as our standard for our housing projects beginning this year! We recognize that this standard contributes to long term affordability for low income residents while reducing green house gas emissions.

For the record, we wish to disagree with the National Performance Path Requirement (dated 7/27/05) where "electric generation cannot be used to increase the HERS score to qualify for Energy Star". We feel that this dismissal of PV is contrary to the goals of the EPA to reduce green house gas emissions. For our programs, a categorical dismissal of PV generation to achieve a higher HERS score for Energy Star qualification is not sensitive to unique housing situations, particularly with older multifamily buildings being renovated to achieve and maintain affordability. In some cases, these old units are not capable of achieving Energy Star qualifications without some additional measures (such as PV).

We are speaking from actual project experience - we have two 1920s-vintage Utah buildings currently being renovated (52 units total). These all electric housing units will be approximately 30% PV-powered. For HERS scoring, those two buildings cannot compete effectively with new construction for envelope efficiency. However, we can compete with new construction and achieve a similar BTU per square foot consumption by offsetting utility-based KWH with solar-provided KWH. We are making all the changes we can make to the envelope and heating/cooling systems of these two buildings. But, without the PV consideration, we come several points short of the Energy Star-qualifying HERS score.

We are petitioning EPA to allow for renewables such as PV within the HERS scoring. This allowance should be significant to allow older buildings to better participate in the program while encouraging a renewable contribution to the green house gas problem.