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

EPA has posted a compilation on its web site of all comments received
during the comment period that ended March 07, 2014.

This document contains a summary of these comments, along with
EPA's response to each point raised and the resulting policy change, if any.

When similar comments were received from multiple respondents,
EPA consolidated these ideas into a single summary bullet. However, EPA has attempted to convey
all unique comments received, including those submitted by a single respondent.

ENERGY STAR Program Requirements for Massachusetts

ID	Comment Summary	EPA's Response	EPA's Policy Decision
1	• All respondents have indicated support for EPA's proposal to discontinue the use of state-specific program requirements for Massachusetts in exchange for aligning with the Version 3.1 national program requirements.	• EPA agrees that the Version 3.1 National Program Requirements should be utilized in place of the Version 3.1 Massachusetts Program Requirements for homes in Massachusetts.	• No policy change.
2	• One respondent has objected to the implementation of a more stringent version of the program requirements in MA, due to the potential for market confusion.	• EPA agrees that implementing Version 3.1 at the state level will slightly increase the complexity of the program, relative to implementing Version 3.1 at the national level. However, EPA does not agree that this will result in significant market confusion. For consumers, a home certified under either version will represent meaningful energy savings coupled with better quality, comfort, and durability. For builders, the only difference between Version 3 and Version 3.1 will be the efficiency measures selected to meet the ENERGY STAR HERS index target, which is already variable. And finally, for Raters and contractors, the process of certifying a home will be identical under both versions.	• No policy change.
3	• One respondent has indicated support for EPA's proposal to delay the implementation timeline for the Version 3.1 program requirements for homes in Massachusetts until January 1, 2015.	• EPA agrees that the implementation timeline in Massachusetts should be delayed by requiring that homes permitted on or after January 1, 2015 be certified using the v3.1 National Program Requirements.	• No policy change.
4	• One respondent has recommended that, for simplicity, a fixed ENERGY STAR HERS index target of 60 be used when certifying a home under the Performance Path.	• Substantial variation in the HERS Index can result from several components of the home that are not influenced by a market transformation program, such as fuel type, location within a climate zone, foundation, aspect ratio, and number of bedrooms. For this reason, requiring a target HERS Index that is tailored to each individual home ensures a more consistent level of energy efficiency improvements across ENERGY STAR certified homes.	• No policy change.
5	• One respondent has recommended that the window requirements in the Version 3.1 program requirements simply be aligned with the ENERGY STAR Certified Residential Windows, Doors and Skylights program, which currently requires a U-factor of 0.30 in the Northern Climate Zone, rather	• The window U-factors defined in the Version 3.1 National Program Requirements do, in fact, align with the recently finalized, latest, version of the ENERGY STAR Certified Residential Windows, Doors and Skylights program.	• No policy change.

	than requiring a specific U-factor.		
6	• One respondent has stated his belief that the reduction of air leakage around doors is a more important determinant of energy efficiency in opaque doors than the U-factor. For this reason, this respondent has suggested that storm doors should be encouraged and incentivized.	• EPA agrees that the reduction of air leakage around doors is one important component of efficiency. For this reason, the ENERGY STAR Certified Residential Windows, Doors and Skylights program includes infiltration limits. Furthermore, the ENERGY STAR certified homes program also credits reductions in the overall infiltration of the home, as well as requires that key details be air-sealed to limit infiltration.	• No policy change.