

EPA Responses to Comments on ENERGY STAR Certified Homes, Version 3.1 (Rev. 00) Program Requirements for Massachusetts

EPA previously posted a compilation on its web site of all comments received during the comment period for its proposed ENERGY STAR Certified Homes, Version 3.1 (Rev. 00) Program Requirements for Massachusetts, which ended September 20, 2012.

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 retain all unique comments received, including those submitted by a single respondent.

*The Environmental Protection Agency
is not responsible for any typographical errors or omissions.*

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ENERGY STAR Program Requirements for Massachusetts

ID	Comment Summary	EPA's Response	EPA's Policy Decision
General			
1	<ul style="list-style-type: none"> One respondent asked if rating software will incorporate the Massachusetts-specific reference design. 	<ul style="list-style-type: none"> EPA is working with rating software vendors to incorporate the Massachusetts-specific reference design. Note that EPA has provided a process for the Rater to manually determine the ENERGY STAR HERS Index Target until a version of the RESNET-accredited software program used by the Rater becomes available that automatically configures the ENERGY STAR Reference Design, calculates its associated HERS Index value, and then applies the appropriate Size Adjustment Factor to determine the ENERGY STAR HERS Index Target. 	<ul style="list-style-type: none"> No Policy Change
2	<ul style="list-style-type: none"> One respondent noted that some efficiencies listed in the Massachusetts ENERGY STAR Version 3.1 Certified Homes Program are lower than the those listed in the baseline home study prepared by the Massachusetts utilities. Examples include the air conditioning efficiency, gas water heater efficiency, and skylight efficiency. 	<ul style="list-style-type: none"> It is true that some homes in the market may be exceeding some of the minimum requirements of the code. This might occur for a variety of reasons, such as utility rebate programs or influence by the ENERGY STAR program. Regardless, the overall package of efficiency improvements in the program is designed to be meaningfully more efficient than a home built to minimum code requirements. For those partners using the Performance Path to certify homes, above-code measures that are commonly available, like the ones cited in the report, can be used to help meet the ENERGY STAR HERS Index Target. 	<ul style="list-style-type: none"> No Policy Change
ENERGY STAR Version 3.1 Reference Design for Massachusetts			
3	<ul style="list-style-type: none"> One respondent asked EPA to define the efficiency requirements for boilers by fuel type, as oil boilers are typically less efficient than gas boilers. 	<ul style="list-style-type: none"> EPA agrees that the efficiency of available boilers varies by fuel type and that, in particular, the efficiency of available oil boilers is lower than the efficiency of available gas boilers. For this reason, EPA agrees with the respondent that the efficiency requirements for boilers in the Reference Design should be defined by fuel type. 	<ul style="list-style-type: none"> EPA has defined separate efficiency requirements for gas and oil boilers in the Heating Systems Section in Exhibit 2 of the ENERGY STAR Certified Homes, Version 3.1 (Rev. 00) HERS Index Target Procedure for Massachusetts Program Requirements. Oil boilers are now required to be ≥ 86 AFUE while gas boilers are required to be ≥ 90 AFUE. The same change has been reflected in

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			<p>Exhibit 1 of the ENERGY STAR Certified Homes, Version 3.1 (Rev. 00) Program Requirements for Massachusetts.</p>
<p>4</p>	<ul style="list-style-type: none"> • One respondent noted that the Prescriptive Path only states that a Heat Recovery Ventilator (HRV) will meet the requirement for ventilation. They suggested adding an allowance for an Energy Recovery Ventilator (ERV) to be used to avoid confusion. 	<ul style="list-style-type: none"> • EPA agrees with the respondent that properly specified ERV systems that meet the sensible recovery efficiency requirements should be permitted to be used to meet this requirement. 	<ul style="list-style-type: none"> • EPA has updated the Mechanical Ventilation Section in Exhibit 1 of the ENERGY STAR Certified Homes, Version 3.1 (Rev. 00) Program Requirements for Massachusetts to state “Heat Recovery Ventilator (HRV) or Energy Recovery Ventilator (ERV) installed with $\geq 55\%$ sensible recovery efficiency” to clarify that the installation of either an HRV or ERV with the noted efficiency levels meets the intent of this requirement.