

Comments Via E-mail From Rita Ransom, Southwest Gas

Thanks for the opportunity to comment on the revised proposal for ENERGY STAR guidelines. Here are the comments from Southwest Gas:

- 1) In those locations that have not already adopted the IECC, compliance with these new guidelines may be more difficult. Should Southwest Gas expand our energy-efficient new construction program to areas other than Tucson, Arizona, the IECC may not have been adopted in those areas and could therefore present an obstacle to program implementation.
- 2) Likewise, in other Southwest Gas Arizona service areas there may be less availability of the required higher efficiency water heaters, air conditioners, ENERGY STAR light fixtures, appliances, fans, etc. Therefore, these items may be cost-prohibitive and hinder program implementation.
- 3) There are two other concerns:
 - a. Grandfather period - Given the long lead time required by builders for project development, July 1, 2006 is still too close a deadline for 100% compliance. We recommend one full year. If the guidelines go into effect in January 2006, then the grandfather period at a minimum should last until December 31, 2006.
 - b. Thermal bypass checklist - This requirement, while commendable, will result in either a longer time to complete the home inspection, and/or require an additional visit. This could add considerably to the cost per home and therefore potentially reduce the number of homes that can be accommodated by our program budget.

We look forward to hearing the results of this comment process.