

Comments Via E-mail From Robin Kemker, Utah Housing Corporation

Thank you for the opportunity to respond to recent proposed changes to the Energy Star rating program.

I am the Director over the Low-income Housing Tax Credit program for the State of Utah. We have implemented incentives for projects to participate in Energy Star Certification. We expect to make them mandatory for new construction projects beginning in 2007.

We are attempting to foster the preservation of existing housing in Utah. It is far more efficient to rehabilitate existing construction than new construction. One problem we do see is that the threshold for Energy Star is too high, especially for projects over 30 years old. The removal of the Solar Photovoltaic option from the HERS for Energy Star certification will be detrimental for these types of projects.

Some HERS qualified improvements cannot feasibly be accomplished in a rehabilitation, but Solar Voltaic is a possible alternative to the envelope and other construction improvements that are not feasible in rehabilitations. Without Solar Voltaic, we probably will have little hope of encouraging substantial efforts to obtain Energy Star in these projects. The new panels are 25% more efficient than prior technology and offer a substantial improvement in energy conservation.

I would add that the limit of 5 compact fluorescent lights also falls into the same situation as above for rehabilitation projects. This should not be limited to 5 fixtures. Additionally, additional points should be allowed for permanent fixtures equipped with electronic ballast and T-8 lamps.

I hereby request that you allow:

1. Solar Photovoltaic for the HERS score and the Energy Star certification.
2. Additional HERS score for 6 or more compact fluorescent lights.
3. Points for permanent fixtures equipped with electronic ballast and T-8 lamps.