

EPA Responses to Comments on ENERGY STAR Certified Homes National Program Requirements, Version 3.1

EPA previously posted a compilation on its web site of all comments received during the comment period for its proposed ENERGY STAR Certified Homes national program requirements, Version 3.1, which ended December 20, 2013.

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.

EPA Responses to Version 3.1 ENERGY STAR Certified Homes Comments

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ENERGY STAR Version 3.1 National Program Requirements

ID	Comment Summary	EPA's Response	EPA's Policy Decision
Implementation Strategy and Timeline			
1	<ul style="list-style-type: none"> Several respondents have recommended delaying implementation of any new version until a future date, as a result of continued market challenges in the housing industry and the recent implementation of Version 3. One respondent has specifically recommended aligning enforcement with adoption of the 2015 IECC, rather than the 2012 IECC. Another respondent has recommended implementing only major versions (e.g., Version 4), rather than interim versions (e.g., Version 3.1), and doing so on a regular periodic basis, such as every three years. 	<ul style="list-style-type: none"> One of the key brand promises of the ENERGY STAR Certified Homes Program is to provide meaningful savings relative to non-certified homes. For example, EPA developed Version 3 of the program, in large part, to maintain meaningful savings relative to the 2009 IECC. Therefore, in states that have adopted the 2012 IECC, the program requirements must be revised to meet this promise. Waiting until state-level adoption of the 2015 IECC would result in many homes being certified that were not meaningfully more efficient than the 2012 IECC code. With that said, EPA does recognize that some builders continue to face market challenges and are still adapting to the Version 3 program requirements. In an attempt to maintain meaningful savings while minimizing the burden on our partners, EPA has proposed that only the ENERGY STAR HERS index target be made more stringent under Version 3.1 of the program. Partners have generally indicated that the four inspection checklists have been the most challenging component of Version 3 and, therefore, EPA is proposing that these remain identical in Version 3.1. Furthermore, EPA has proposed delaying implementation of Version 3.1 until one year after state-level enforcement of the 2012 IECC. The proposed implementation timeline will provide partners with as much time as is possible to prepare for the new version and will prevent simultaneous changes to the code and the ENERGY STAR program requirements. 	<ul style="list-style-type: none"> No policy change.
2	<ul style="list-style-type: none"> Several respondents have requested that the Version 3.1 program requirements be enforced nationally, using a single implementation timeline, rather than enforced at the state-level as each state adopts the 2012 IECC. Respondents believe that national enforcement would ease implementation and reduce marketplace confusion, and that the program would benefit from holding all states to a consistent level of performance. 	<ul style="list-style-type: none"> To date, only five states have adopted the 2012 IECC or an equivalent code. This is projected to increase to 19 states by 2015. Therefore, while EPA intends to implement Version 3.1 in the states with this more stringent code, it believes that simultaneously implementing the requirements in the remaining 31 states where meaningful savings are currently being achieved under Version 3 would impose an unnecessary burden on partners. For this reason, EPA does not intend to implement Version 3.1 nationally at this time. At some point in the future (e.g., after a large majority of states have adopted the 2012 IECC), EPA may elect to enforce the Version 3.1 program requirements at the national level. Note that if this is done, EPA will first propose a national implementation timeline and solicit comments from stakeholders. Regarding partner concerns about market confusion, EPA agrees that implementing Version 3.1 at the state level will slightly increase the 	<ul style="list-style-type: none"> No policy change.

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		<p>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.</p>	
3	<ul style="list-style-type: none"> One respondent has noted that Massachusetts will not implement the 2012 IECC until July 1, 2014 and, therefore, has recommended delaying implementation of Version 3.1 until this date or for one year following this date. 	<ul style="list-style-type: none"> In 2012, prior to the development of the national Version 3.1 program requirements, Massachusetts stakeholders approached EPA about developing Version 3.1 program requirements specifically for their state. At that time, Massachusetts was one of the first states in the country planning adoption of the 2012 IECC. Because EPA had no national policy in place at that time for a code of this stringency, it developed the Massachusetts state-specific requirements. At the time that these requirements were developed, EPA defined an implementation timeline in consultation with the stakeholders in that state. <p>As noted by the respondent, implementation of the new Massachusetts code has since been delayed until July 1, 2014. Furthermore, the current implementation timeline agreed upon for Massachusetts differs from the proposed implementation timeline for the national v3.1 program requirements, which is one year after state-level implementation of the 2012 IECC.</p> <p>To address these points, EPA is currently convening a call with stakeholders in Massachusetts to discuss whether the implementation timeline should be adjusted to reflect the delay in the code enforcement and the proposed timeline for the national program.</p>	<ul style="list-style-type: none"> No policy change at this time. However, as noted in the response, EPA will convene a call with stakeholders in Massachusetts to further discuss whether the implementation timeline should be adjusted.
4	<ul style="list-style-type: none"> Several respondents have noted that some states (e.g., Colorado) do not have a state-level energy code, but rather adopt codes at the jurisdiction level. These respondents have asked for further clarification on how Version 3.1 will be implemented in such states. 	<ul style="list-style-type: none"> To reiterate EPA's proposed policy, the Version 3.1 program requirements will only be implemented where the 2012 IECC, or an equivalent code, has been adopted at the state level. Therefore, in a state such as Colorado, which has no state-level code, Version 3.1 will not be implemented at this time. <p>At some point in the future (e.g., after a large majority of states have adopted the 2012 IECC), EPA may elect to enforce the Version 3.1 program requirements at the national level. Note that if this is done, EPA will first propose a national implementation timeline and solicit comments from stakeholders.</p>	<ul style="list-style-type: none"> No policy change.
5	<ul style="list-style-type: none"> One respondent has asked if a home in a state that has not yet adopted the 2012 	<ul style="list-style-type: none"> The only difference between a home certified under Version 3 and one certified under Version 3.1 will be the efficiency measures selected to 	<ul style="list-style-type: none"> No policy change.

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	<p>IECC is eligible to earn the ENERGY STAR under Version 3.1.</p>	<p>meet the ENERGY STAR HERS index target, which is already variable for every certified home. Furthermore, for consumers, a home certified under either version will represent the same thing - meaningful energy savings coupled with better quality, comfort, and durability.</p> <p>For these reasons, EPA will allow partners to certify a home under Version 3.1 of the program if they so choose, in advance of the state-level implementation of Version 3.1. However, partners will be required to wait to certify homes under Version 3.1 until RESNET-accredited home energy rating software is available that automatically configures the Version 3.1 ENERGY STAR Reference Design Home, calculates its associated HERS Index value, and then applies the Size Adjustment Factor to determine the ENERGY STAR HERS Index Target. That is to say, partners will not be permitted to manually determine the ENERGY STAR HERS Index Target, as was permitted during the early implementation of Version 3.</p>	
ENERGY STAR Reference Design & Performance Path Requirements			
<p>6</p>	<ul style="list-style-type: none"> One respondent has requested that EPA formally state that a home certified under Version 3.1 will exceed the 2012 IECC, so as to ease the code compliance process. 	<ul style="list-style-type: none"> The primary goal of the ENERGY STAR program is to reduce greenhouse gas emissions through the labeling of efficient products, homes, and buildings. Therefore, while the Version 3.1 program requirements are designed to result in homes that are at least 15% more efficient than a home built to the 2012 IECC, this does not mean, in and of itself, that the home is also necessarily compliant with all of the mandatory requirements of the code. To cite just one example, the 2012 IECC includes mandatory efficiency requirements for spas, in-ground pools, and snow-melt systems, which are beyond the scope of the ENERGY STAR Certified Homes program requirements. <p>For this reason, EPA cannot formally state that every certified home will meet all of the requirements of the 2012 IECC. However, it is true that most certified homes will meet or exceed most, if not all, of the code requirements. Therefore, in the year ahead, EPA will prepare supplemental guidance for partners, jurisdictions, and other interested parties that clarifies the overlap between ENERGY STAR certification and the 2012 IECC model code. This guidance will demonstrate the substantial number of code requirements that are met through certification, as well as the small number of additional items or tasks that must be completed to fully demonstrate compliance with the 2012 IECC model code.</p>	<ul style="list-style-type: none"> No policy change. However, as noted in the response, EPA will prepare supplemental guidance for partners, jurisdictions, and other interested parties that clarifies the overlap between ENERGY STAR certification and the 2012 IECC model code.
<p>7</p>	<ul style="list-style-type: none"> One respondent has noted that the ENERGY STAR Reference Design infiltration level of 3 ACH50 in Climate Zones 3-7, which aligns with the 2012 IECC, is difficult to achieve in some house types (e.g., attached housing). 	<ul style="list-style-type: none"> EPA believes that the infiltration level of 3 ACH50 is achievable and cost-effective, though acknowledges that meeting this limit in attached housing will be more difficult than in detached housing. With that said, the program requirements do not include a mandatory infiltration limit for a home using the Performance Path. Instead, a home using the Performance Path in Climate Zones 3-7 will be benchmarked against a home with infiltration of 	<ul style="list-style-type: none"> No policy change.

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		<p>3 ACH50. If the infiltration of the rated home is higher than this level, then the home will still be permitted to be certified as long as other efficiency measures have been selected to offset this impact. Furthermore, in the interest of helping partners to both certify a home and meet all 2012 IECC code requirements, EPA will provide additional training and resources in the year ahead to educate partners about how to achieve an infiltration rate that is ≤ 3 ACH50.</p>	
8	<ul style="list-style-type: none"> One respondent has asked if the Version 3.1 program requirements require that duct leakage testing be performed at 'rough-in'. The respondent has also asked for clarification on how the inclusion of the HVAC systems and ducts in conditioned space in the ENERGY STAR Reference Design will impact the existing limits on total duct leakage and duct leakage to the outside. 	<ul style="list-style-type: none"> The Version 3.1 program requirements do not contain any new mandatory requirements. However, in the interest of helping partners to both certify a home and meet all 2012 IECC code requirements, EPA recommends that duct leakage testing be performed at 'rough-in' because this test option is the least stringent one for demonstrating compliance with code. Regarding the respondent's second point, the inclusion of HVAC systems and ducts in conditioned space in the ENERGY STAR Reference Design will not impact the existing limits on duct leakage. <p>Because this is not a mandatory requirement for a home certified under the Performance Path, HVAC systems and ducts are allowed to be located in unconditioned space as long as other efficiency measures are selected to compensate. In such a home, the same total leakage and leakage to outside limits that are already defined in the Version 3 program requirements must be met.</p> <p>For a home with all HVAC systems and ducts in conditioned space, Version 3 of the program requirements does not provide an exemption from the total duct leakage test but states that testing of duct leakage to the outside can be waived if total duct leakage is ≤ 4 CFM25 per 100 sq. ft. of conditioned floor area, or ≤ 5 CFM25 per 100 sq. ft. of conditioned floor area for homes that have $\leq 1,200$ sq. ft. of conditioned floor area. This policy will remain unchanged in Version 3.1 of the program requirements.</p>	<ul style="list-style-type: none"> No policy change.
9	<ul style="list-style-type: none"> One respondent has asked whether the Version 3.1 program requirements will result in a Performance Path that is less flexible, while another has asked whether any additional mandatory requirements have been added to the Performance Path (such as those listed in the Version 3.1 Cost & Savings Estimates analysis). Another respondent has specifically asked if the Version 3.1 program requirements require that all HVAC 	<ul style="list-style-type: none"> The Version 3.1 program requirements do not contain any new mandatory requirements. Instead, the measures in the ENERGY STAR Reference Design have been made more efficient. As a result, a home being certified under the Performance Path will be benchmarked against a home configured to the ENERGY STAR Reference Design, including these more stringent measures. If the rated home does not contain one or more of these measures (e.g., if the rated home does not have all HVAC systems and ductwork located within the thermal enclosure system), the home is still allowed to be certified as long as other efficiency measures have been selected that result in equivalent performance. Therefore, the Performance Path is just as flexible as before, but because the ENERGY STAR HERS Index Target will be more aggressive, in general a higher number of total 	<ul style="list-style-type: none"> No policy change.

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	systems and ductwork be located within the thermal enclosure system.	measures will be needed to achieve this target.	
10	<ul style="list-style-type: none"> One respondent has proposed that the Version 3.1 program requirements be tailored to account for any state-level amendments made to the 2012 IECC. They have expressed concern that if amendments are not accounted for, Version 3.1 may become overly stringent in certain states. As one example, the respondent has suggested that state-level amendments in Illinois make the code 6% less efficient than the model 2012 IECC, such that builders would be required to achieve nominal savings of 15% + 6% = 21% to certify a home in that state. The respondent has further suggested that such measures may cost \$4,583 to achieve these incremental savings (e.g., using exterior continuous insulated sheathing) and only save \$140 in annual savings, resulting in a 33 year payback. 	<ul style="list-style-type: none"> EPA understands the respondent's desire to have the Version 3.1 program requirements tailored to reflect the actual energy code adopted by each state, including any amendments to the 2012 IECC model code. However, EPA believes that this ultimately would be more resource-intensive and complex for partners. For builders that build homes across state lines, Raters that verify homes across state lines, and vendors of home energy rating software programs, defining national program requirements will reduce the complexity of the program relative to state-specific program requirements. <p>Furthermore, by defining national program requirements instead of state-specific requirements, the Version 3.1 ENERGY STAR Reference Design can be programmed into home energy rating software now, allowing partners to begin planning for the eventual implementation of v3.1, rather than needing to wait for state-specific program requirements to be defined.</p> <ul style="list-style-type: none"> In the particular example cited by the respondent, the Illinois state code, only two amendments to the 2012 IECC were adopted that would potentially impact the national Version 3.1 program requirements – the infiltration was increased from 3 ACH50 to 5 ACH50 and the depth of basement wall insulation was reduced from 10 ft. below-grade (or to the basement floor) to 4 ft. below-grade (or to the basement floor). EPA modified the home configurations used in the ENERGY STAR Certified Homes Draft Version 3.1 Cost & Savings Estimates to reflect these amendments and found that the combined impact was 2 to 4 HERS index points for the gas homes, primarily due to the change in infiltration rate. <p>Rather than modifying the ENERGY STAR HERS index target for Illinois to reflect these changes, EPA is instead proposing that partners would need to overcome this deficit by selecting measures that improve the HERS index by this amount. One solution would be to decrease the infiltration rate from 5 to 3 ACH50. In fact, because many builders certifying homes under Version 3 in cold climates are likely to already be achieving infiltration rates near 3 ACH50, EPA believes that this measure would be more attractive to many builders than increasing the amount of exterior continuous insulated sheathing, which the respondent estimated to cost \$4,583.</p>	<ul style="list-style-type: none"> No policy change.
Incremental Costs & Savings			
11	<ul style="list-style-type: none"> Several respondents have expressed concern that the incremental cost 	<ul style="list-style-type: none"> While EPA is not inherently opposed to defining program requirements that result in a home that is 10% more efficient than a home built to code, 	<ul style="list-style-type: none"> No policy change.

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	<p>increases associated with the Version 3.1 program requirements, relative to the incremental savings, are too high, particularly because of recent increases in program stringency and a lack of recognition of these costs in the appraisal process. These respondents have proposed that the savings target be lowered, with some specifically suggesting 10% savings relative to the 2012 IECC, to lower the incremental costs while maintaining meaningful savings.</p>	<p>it does not believe that this reduced savings target is warranted for the Version 3.1 national program requirements. The program requirements, which are designed to achieve savings of at least 15%, are preferable for several reasons:</p> <ul style="list-style-type: none"> ○ EPA's Version 3.1 Cost & Savings Estimates analysis indicates incremental costs ranging from approximately \$1,575 to \$1,975 and annual purchased energy savings ranging from approximately \$325 to \$775, resulting in a positive net cashflow for consumers. Furthermore, these results are even more cost effective than the v3 program requirements, largely due to mandatory measures in the program requirements that are now also mandatory measures in the 2012 IECC (e.g., whole-house mechanical ventilation); ○ The target is achievable using several different combinations of measures, comprised of 'off-the-shelf' technologies; ○ The target ensures that the Version 3.1 program requirements will be relevant even if anticipated increases in federal minimum equipment efficiency standards occur over the next several years (e.g., furnaces, air conditioners, heat pumps). <ul style="list-style-type: none"> ● In addition, EPA has attempted to make compliance with the national Version 3.1 program requirements as easy as possible by reducing the impact of the size adjustment factor, by not adding any new mandatory checklist items, and by defining an extended implementation timeline. 	
12	<ul style="list-style-type: none"> ● One respondent has suggested that a number of costs cited in the Version 3.1 Cost & Savings Estimates analysis are not reflective of the respondent's costs, including changing from an atmospherically-vented water heater, upgrading from incandescent to CFL bulbs, meeting the 2012 IECC attic insulation level of R-49, adding raised-heel trusses, decreasing window U-value to 0.27, and moving ductwork and HVAC equipment into conditioned space. ● Another respondent has expressed concern that the estimated savings in the Version 3.1 Cost & Savings Estimates analysis are based upon a home configuration that may not be representative of specific markets. 	<ul style="list-style-type: none"> ● The purpose of the Version 3.1 Cost & Savings Estimates analysis is to provide builders, raters, utility sponsors, and program designers with one transparent estimate of the incremental costs to build an ENERGY STAR certified home, and the associated savings from an ENERGY STAR certified home, relative to the 2012 ICC codes. EPA recognizes that the incremental costs and savings for any particular home will be dependent on such variables as its architectural design (e.g., foundation type, window area, size), baseline construction practices, the measures selected to demonstrate compliance, vendor relationships, and market conditions. Therefore, the respondent's incremental costs may, in fact, deviate from the costs documented in EPA's analysis. ● With that said, it is worth noting that the requirement for a power-vented water heater is also contained in Version 3. Therefore, there should be no increase in costs for this measure in Version 3.1 relative to the costs for Version 3. ● In addition, while the attic insulation levels, window U-values, CFL percentage, and duct location have all been improved in the Version 3.1 ENERGY STAR Reference Design, the mandatory requirements in the Inspection Checklists remain unchanged. Therefore, partners using the Performance Path would have the option of using the same amount of attic insulation, the same windows, the same percentage of CFL's, and the 	<ul style="list-style-type: none"> ● No policy change.

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		<p>same duct location as they are currently using under Version 3, as long as other measures are selected that offset the reduced performance level from these measures relative to the Version 3.1 ENERGY STAR Reference Design. It is also worth noting that it is EPA's understanding that double-pane windows are currently available that meet the improved performance level of a 0.27 U-value and that availability will only increase in the future.</p>	
13	<ul style="list-style-type: none"> • One respondent has expressed concern that the estimated savings in the Version 3.1 Cost & Savings Estimates analysis: <ul style="list-style-type: none"> • Assume no failure rate in the application of the program requirements; and, • Incorporate two adjustment factors that are not substantiated by field studies. • The respondent has also suggested that EPA invest in studies to quantify actualized savings and failure rates at the measure-level. 	<ul style="list-style-type: none"> • A failure rate was not considered when estimating savings because every ENERGY STAR certified home is required to meet all requirements of the program. Note that failures were also not assumed for the baseline home, which is assumed to be complying with minimum code requirements. Given the requirements for third-party verification in the ENERGY STAR program, EPA would anticipate a higher failure rate among the population of baseline homes than among the population of ENERGY STAR certified homes. Therefore, EPA believes the assuming 100% compliance for both the baseline and ENERGY STAR certified homes is a conservative one. • EPA agrees that it would be preferable to have field studies to use as the basis for the adjustment factors used in the Version 3.1 Cost & Savings Estimates analysis. However, such studies are not available to the best of EPA's knowledge and EPA is unable to fund such studies at this time. In lieu of this, EPA is using the best information available at this time. • The purpose of the Version 3.1 Cost & Savings Estimates analysis is to provide builders, raters, utility sponsors, and program designers with one transparent estimate of the incremental costs to build an ENERGY STAR certified home, and the associated savings from an ENERGY STAR certified home, relative to the 2012 ICC codes. EPA recognizes that its partners may choose to further refine these estimates to better reflect their particular needs. For example, using the analysis as a starting point, a partner could apply a failure rate or eliminate the adjustment factors. 	<ul style="list-style-type: none"> • No policy change.
14	<ul style="list-style-type: none"> • One respondent has recommended that EPA invest in quantifying the deferred maintenance costs, lower insurance costs, and reduced callbacks associated with the Version 3.1 program requirements, to encourage additional adoption of the program by builders. 	<ul style="list-style-type: none"> • EPA agrees it would be helpful to quantify deferred maintenance costs, lower insurance costs, and reduced call backs as a result of certifying a home, but the resources to do so are unavailable at this time. EPA does, however, welcome input from partners on how these metrics could be more easily and cost-effectively quantified in the future. 	<ul style="list-style-type: none"> • No policy change.
Miscellaneous			
15	<ul style="list-style-type: none"> • One respondent has requested that because of the low cooling and heating loads that may result from the Version 3.1 program requirements: <ul style="list-style-type: none"> • Additional flexibility be provided 	<ul style="list-style-type: none"> • EPA believes that the issues raised by the respondent – sizing limits for low load homes, advanced ventilation systems, and homeowner education – are equally important to Version 3 and Version 3.1 certified homes. In addition, with regards to the sizing limits, EPA has relied to the greatest extent possible upon existing industry standards to define its program 	<ul style="list-style-type: none"> • No policy change.

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	<p>for equipment sizing limits;</p> <ul style="list-style-type: none"> Balanced and distributed ventilation be encouraged or required; and, Operation & maintenance manuals be developed for homeowners. 	<p>requirements, though it recognizes that these standards may be limiting flexibility in low-load homes. Therefore, while no new requirements or allowances have been proposed for Version 3.1 to ease compliance, EPA will continue to refine the Version 3/3.1 Inspection Checklists as needed to address sizing limits, and will consider including additional requirements related to ventilation and homeowner education in future versions of the program requirements.</p>	
16	<ul style="list-style-type: none"> One respondent has suggested that the program requirements should reward smaller homes by defining less rigorous requirements, in recognition of lower energy consumption per occupant than in larger homes. 	<ul style="list-style-type: none"> One of the key brand promises of the ENERGY STAR Certified Homes Program is to provide meaningful savings relative to non-certified homes. Therefore, while EPA believes it is appropriate to encourage an even higher percentage of savings for homes that are larger than the Benchmark Home Size, it believes that encouraging a lower percentage of savings for homes that are smaller than the Benchmark Home Size would not be consistent with the goals of the program. 	<ul style="list-style-type: none"> No policy change.
17	<ul style="list-style-type: none"> One respondent has suggested revising the Performance Path of the program by removing mandatory quantitative requirements (e.g., duct leakage limits, minimum insulation R-values) that are already accounted for in the HERS index and defining only mandatory qualitative requirements (e.g., locate ducts in conditioned space, use only sheet-metal ducts, visually inspect sealing). 	<ul style="list-style-type: none"> To reduce complexity and ease the transition for partners to Version 3.1, EPA has not proposed any changes to the mandatory requirements within the Inspection Checklists. By not making any changes, EPA can maintain identical Inspection Checklists for both Version 3 and Version 3.1. EPA will, however, take the respondent's suggestions into consideration when developing future versions of the program. 	<ul style="list-style-type: none"> No policy change.
18	<ul style="list-style-type: none"> One respondent has requested that the whole-house mechanical ventilation requirements be removed from the program requirements to improve the efficiency of certified homes. 	<ul style="list-style-type: none"> One key brand promise of the ENERGY STAR program is to differentiate products, buildings and homes that save energy without compromising quality. Given the reduced infiltration that is common among many new homes and all ENERGY STAR certified homes, the inclusion of a whole-house mechanical ventilation system is a mandatory requirement that helps maintain the comfort, durability, and indoor air quality of the home. Not only is this a critical requirement of the ENERGY STAR Certified Homes program, this is also a mandatory requirement of the 2012 IECC. Therefore, this feature will become increasingly common in all new homes, not just ENERGY STAR certified homes. 	<ul style="list-style-type: none"> No policy change.
19	<ul style="list-style-type: none"> One respondent has suggested that all four checklists be combined into a single Rater-verified checklist, while another has suggested reformatting the checklists into one checklist for pre-drywall requirements and one checklist for post-drywall requirements, with appropriate columns for each responsible party. 	<ul style="list-style-type: none"> To reduce complexity and ease the transition for partners to Version 3.1, EPA has not proposed any changes to the Inspection Checklists. By not making any changes, EPA can maintain identical Inspection Checklists for both Version 3 and Version 3.1. With that said, partners are permitted to rearrange the checklist items for their own use, to better reflect their inspection processes, but are liable for ensuring that all requirements are represented on their reformatted version. Furthermore, EPA will take the respondent's suggestions into consideration when developing future versions of the program. 	<ul style="list-style-type: none"> No policy change.

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20	<ul style="list-style-type: none"> • One respondent has recommended the following: <ul style="list-style-type: none"> • Tailoring the HVAC System QI Contractor and Rater Checklists to reflect regional climates and HVAC equipment types. • Increasing the oversight and transparency of design parameters used in the HVAC design process. • Increasing the permissible deviation between measured and designed room airflows, to reflect measurement inaccuracies and allow for additional contractor discretion. • Allowing alternate equivalent methods be used to meet the intent of the Checklists, at the discretion of the Provider, such as code enforcement, self-verification for builders participating in quality construction programs, or insurance industry agreements. • Explicitly grouping townhomes and rowhouses under the ENERGY STAR Certified Homes program, and developing separate efficiency and verification requirements for remaining low-rise multifamily structures, such as stacked and clustered multifamily units. 	<ul style="list-style-type: none"> • The respondent's suggestions apply equally to the Version 3 and Version 3.1 program requirements. Therefore, while each comment may have merit, EPA has not proposed any changes to the Inspection Checklists in order to reduce complexity and ease the transition for partners to Version 3.1. By not making any changes, EPA can maintain identical Inspection Checklists for both Version 3 and Version 3.1. <p>EPA will, however, continue to work with partners as needed through the Revision process to refine the Version 3 / 3.1 Inspection Checklists to address regional climates and HVAC system types, improve the transparency of the design parameters, and increase the permissible deviation between measured and designed room airflows.</p> <p>EPA will also take the respondent's suggestions regarding increased oversight of HVAC design parameters, alternate equivalent methods for meeting the Inspection Checklists, and program eligibility of townhomes and rowhouses into consideration as it develops future versions of the program requirements.</p>	<ul style="list-style-type: none"> • No policy change.
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