
From: Vokes.Kathleen@epamail.epa.gov
Sent: Tuesday, March 30, 2010 11:14 PM
To: Hauschild, Bruce
Cc: energystarverificationprogram@energystar.gov
Subject: Re: Energy Star Enhanced Testing phone conference.

Bruce,

Thank you for your note. We appreciate your comments and will plan to address this comment in our response to comments in May.

Kathleen

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| "Hauschild, Bruce" <Bruce.Hauschild@nebraska.gov>
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| Kathleen Vokes/DC/USEPA/US@EPA
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| Energy Star Enhanced Testing phone conference.
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Kathleen,

I did not see much on enforcement during your testing webinar. I saw nothing that would deter someone from abusing the Energy Star logo or attempting to falsify test results, like a good stiff fine. I really think that if you want to deter abuse of the Energy Star rating, you will need to make manufacturer's think twice, and money seems to be the driving factor, i.e. they want the Energy Star rating so they can sell more product. Manufacturer's also have to realize that if they abuse that rating system, it's going to cost them, and that cost must be sufficient to deter the abuse.

I broached the question of fines during Q/A of the webinar, and from the one rebuttal, "that fines would be detrimental," it seemed to have hit a nerve. I do not see how fines would be detrimental. If a manufacturer's products meet energy star requirements, they have nothing to worry about. Are speeding fines detrimental, YES, they deter people from speeding. If you don't speed, you don't get fined. If you're going to play, you need to play by the rules.

I would guess that you'll get arguments from plenty of the manufacturers on this. Energy Star is a lot like the Energy Codes. A home built to just meet the Energy Code is the worst home you can legally build, i.e. the code is not a standard, it is a minimum. If manufacturer's are concerned about just barely meeting Energy Star requirements, they should probably look more seriously at EXCEEDING them. Build in room for error. Manufacturer's shouldn't put the logo on products unless, they are certain the product will meet the requirements, whenever tested.

Bruce Hauschild, PE, CEM
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