



Designed to Earn the ENERGY STAR Eligibility Criteria Change Comment Summary and Responses

July 2024

This document provides the EPA's responses to the comments received on the proposal to change to the eligibility criteria for achieving its Designed to Earn the ENERGY STAR recognition for U.S. commercial new construction and major renovation design projects. In total, EPA received comments from 25 individual stakeholders. All comments were summarized and in cases where comments were similar, EPA combined summaries and provided a single response where appropriate.

Topics:

1. [Existing Building ENERGY STAR Certification](#)
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Existing Building ENERGY STAR Certification

A few comments pertained to the ENERGY STAR certification for existing buildings rather than Designed to Earn the ENERGY STAR recognition for multifamily and commercial new construction and major renovation projects.

Response: The EPA emphasizes that the proposed change in eligibility criteria applies only to the **Designed to Earn the ENERGY STAR recognition** for multifamily and commercial new construction and major renovation projects. EPA is not proposing to change the eligibility criteria for earning ENERGY STAR certification for existing buildings.

Impact on Quantity of Projects Meeting Designed to Earn the ENERGY STAR Requirements

One comment suggested fewer commercial new construction projects will achieve Designed to Earn the ENERGY STAR because of the more stringent criteria. An additional comment stated that now is not the appropriate time for the proposed change because of low development rates in many areas of the country.

Response: The EPA has proposed raising the required design score to encourage use of robust energy efficient strategies during design, when it is most cost-effective to

incorporate new technologies and innovative strategies. Past applications the EPA has received for Designed to Earn the ENERGY STAR recognition demonstrate that new commercial building and major renovation project designs can attain an ENERGY STAR score of 80 or higher when adopting best practices such as those found in EPA's [ENERGY STAR Design Guidance](#). Further, EPA does not anticipate that increasing the required score for Designed to Earn the ENERGY STAR recognition will affect the rate of new development but rather encourage new development that does occur to strive for greater efficiency.

Fuel Mix

One comment encouraged EPA to consider the ability to attain a score of 80 for buildings using a range of energy sources.

Response: The EPA agrees and is confident that projects using a variety of fuel sources will be able to achieve the required ENERGY STAR design score of 80. Analysis of past projects scoring 80 and above shows that they often align with the typical fuel mix for their intended location; that is, they include electricity and use of onsite fuels. Most projects submitted to EPA with a design score of 80 or higher and achieved Designed to Earn the ENERGY STAR recognition do not favor a particular fuel mix.

Cost

One comment expressed both overall support for raising the criteria to 80 and concern about the associated costs.

Response: Considering well-integrated energy efficiency strategies throughout the design process minimizes change orders and value engineering of efficiency measures, often resulting in design and operational cost savings over the building's lifespan. Moreover, EPA has found that projects with a score of 80 and higher have faced minimal, if any increased costs, and that the benefits of greater efficiency outweigh any incremental costs.

Support for Proposed Change

Many commenters support the proposed change and cited benefits of promoting deeper energy efficiency in the design phase.

Response: The EPA encourages your continued support and participation in promoting and submitting projects that achieve Designed to Earn the ENERGY STAR recognition.

Program Recommendations

Two comments recommended that the EPA adopt a tiered approach to Designed to Earn the ENERGY STAR recognition instead of a single score.

Response: ENERGY STAR recognition is designed to offer a simple and clear marker of efficiency. Tiers of recognition for different scores would run counter to this important aspect of the ENERGY STAR brand.

A couple of comments recommended changes to the EPA’s Target Finder tool.

Response: The EPA values all recommendations that strive to make Designed to Earn the ENERGY STAR recognition more valuable. We will consider the suggestions as we explore future development plans.