

**Comments Received During the Stakeholder Feedback Periods for
ENERGY STAR California Single Family New Homes Version 3.5 and
Multifamily New Construction Version 1.5**



ENERGY STAR California Single Family New Homes Version 3.5 / Multifamily New Construction 1.5

Comments Received

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ENERGY STAR California Single Family New Homes Version 3.5 / Multifamily New Construction 1.5

Comments Received

Organization Name: ARCXIS

Respondent Last Name: Williamson

Respondent First Name: Estee

Comments:

General

Definition of California SFNH Version 3.5 and MFNC Version 1.5 Program Requirements

- 1) The EPA is proposing new performance targets for the next versions of the ENERGY STAR Single-Family New Homes (SFNH) and Multifamily New Construction (MFNC) Program Requirements for California. For SFNH, the proposed targets are an Efficiency LSC ≥ 5 points better than, or an Efficiency LSC Compliance Margin $\geq 10\%$ above, the 2025 Building Energy Efficiency Standards. For MFNC, the proposed metric is an Efficiency LSC Compliance Margin $\geq 10\%$ above the 2025 Building Energy Efficiency Standards. Do you have feedback on the proposed new performance targets?

[N/A]

- 2) Do you have additional general feedback on this topic?

[N/A]

More Stringent Infiltration Backstop for the SFNH Program

- 1) The EPA has previously proposed introducing an infiltration backstop in the next revision of its SFNH program requirements, with a backstop of 4.5 ACH50 for CA v3.2 and CA v3.3, and 4.0 ACH50 for CA v3.4, with an alternative for homes smaller than 1,500 sq. ft. and attached homes. For the next version of the SFNH program requirements in California, it is proposing to advance the infiltration backstop to 3.5 ACH50, while maintaining the same alternative metric for small homes and attached homes. Is there any reason to believe that this is not achievable for homes certified using the new version?

[California has an assumed Enclosure Air Leakage target of 5 ACH that is not currently verified or required by California Energy Code. We feel that the 3.5 ACH target will be a difficult target to meet and can add additional cost for the builders to reach. We suggest starting with 4.0 ACH for CA v3.5, which would be more than 10% better than the assumed state target and then working towards the 3.5 ACH in the coming versions. Each 0.5 ACH reduction is an exponential decrease to hit. Currently the CEC is considering making the blower door a mandatory requirement in the next 2028 code cycle. (see below)

Suggested infiltration backstops by program version:

CA v 3.2 and 3.3 = 4.8 ACH

CA v3.4 = 4.5 ACH

CA v3.5 = 4.0 ACH]

- 2) Do you have additional general feedback on this topic?

[Add comments]