

**Summary of Comments, EPA Responses, and Resulting Policy Changes Regarding
Key Proposals for Revision 14 of the ENERGY STAR Single-Family New Homes (SFNH)
and Revision 05 of the ENERGY STAR Multifamily New Construction (MFNC) Program**

The EPA has posted a compilation of all comments received during the comment period on key proposals for Revision 14 of the ENERGY STAR SFNH and Revision 05 of the ENERGY STAR MFNC Program on its website.

The comment period was open from July 18, 2024, to August 15, 2024. This document contains a summary of the comments received, along with the EPA's responses and resulting policy changes, if any.

Where similar comments were received from multiple respondents, the EPA consolidated these ideas into a single summary bullet. However, the EPA has attempted to retain all unique comments received, including those submitted by a single respondent.

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ID	Comment Summary	The EPA's Response
Combined proposals for SFNH Revision 14 and MFNC Revision 05		
<i>Eliminate mandatory reduced thermal bridging details</i>		
	<p>A majority of commenters agreed that the proposal to replace the mandatory details (and associated exemptions) with a requirement to accurately assess them per ANSI / RESNET / ICC 301 will result in comparable performance for most homes. Fourteen commenters agreed with this sentiment, while eight disagreed, stating that builders will be less likely to use the details if not mandated to do so.</p> <p>Regarding feedback on specific details:</p> <ul style="list-style-type: none"> • Two commenters thought it was sensible to remove the mandatory requirement for slab insulation, while one believed that it should be retained because it is not consistently inspected for and enforced by code officials. • Three commenters suggested that the requirement to use advanced framing details or an alternative strategy to reduce thermal bridging in walls should be retained. • One commenter agreed that it was sensible to remove the mandatory minimum R-values that must be met at the attic edge. <p>Seven commenters highlighted that the proposal would reduce complexity, add flexibility, and make the program more accessible to builders.</p> <p>Separately, seven commenters requested that more training and guidance be prepared for Raters on how to model, evaluate, and document these details.</p>	<p>The EPA will proceed with the proposal to convert the mandatory reduced thermal bridging details with a requirement to accurately assess them per ANSI / RESNET / ICC 301. The expectation is that partners will continue to incorporate these low-cost commonsense details wherever practical, given that they will help achieve both the ENERGY STAR ERI target and the thermal enclosure “UA” value, which is the area-weighted U-factor of the enclosure. The fact that a subset of homes will forego some details is no different than today, considering the multiple exemptions that have been integrated into the program requirements. As multiple commenters noted, this change will result in a simpler and more accommodating program, while achieving the same overarching goals of delivering efficient homes with high-performing enclosures.</p> <p>The EPA acknowledges that additional training and guidance on these details will be beneficial in promoting their adoption and consistent assessment by Raters. It intends to invest in these resources in the year ahead.</p>
	<p>The EPA also proposed to add a new checklist item to the National Rater Design Review Checklist that recommends but does not require that the Rater identify which reduced thermal bridging details (if any) are intended to be used on the home to be certified. Commenters were approximately evenly split between those who did and did not believe that this would encourage partners to consider and plan for the use of reduced thermal bridging details. Eleven commenters disagreed that this new item would influence partners,</p>	<p>The EPA will proceed with the proposal to add the new checklist item to the National Rater Design Review Checklist. It is acknowledged that the Rater review of the reduced thermal bridging details at the design stage will only be recommended, and not required. Yet, there is value in highlighting these details earlier in the certification process than is done in the current revision of the program documents. Furthermore, as additional training and guidance materials on this topic are developed, they can be referenced by this checklist item.</p>

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	<p>particularly ones that are new to the program, while five were unsure, and nine believed that it would.</p>	
	<p>Other feedback on this topic included a request to develop additional advanced framing details for non-standard wall assemblies (e.g., post and beam construction).</p>	<p>One goal of this proposal is to retain fewer program-specific requirements and instead continue to enhance the industry standard for energy ratings, ANSI / RESNET / ICC 301, to better characterize and reward such strategies in an ERI score. Note that the 2022 edition of the standard contains a more detailed definition of advanced framing which, if met, allows the home to claim a reduced framing fraction. In addition, it allows for improved framing fractions to be claimed if a framing plan with the design framing fraction and a professional engineer’s stamp has been obtained and the framing plan has been verified to match the actual assembly in the field. If there are other standardized strategies that can be used to reduce thermal bridging, the commenter is encouraged to submit a proposal to RESNET for recognition within ANSI / RESNET / ICC 301.</p>
<p><i>Streamline air sealing details and add infiltration backstop</i></p>		
	<p>Commenters were largely supportive of the proposal to streamline the mandatory air-sealing details. Twenty-four commenters supported it in whole or in part, while one was neutral, and three commenters were not supportive.</p> <p>Several of the commenters who were not fully in support of the proposal noted that the mandatory list of air-sealing details should be retained because it is helpful in setting expectations and holding builders’ trades accountable for their role in creating a tight home.</p>	<p>With recognition of the overwhelming support from commenters, the EPA will proceed with the proposal to streamline the mandatory air sealing details contained in the National Rater Field Checklist. To emphasize, the program is only proposing to streamline, not eliminate, the mandatory air sealing details.</p>
	<p>Several respondents recommended that specific mandatory air-sealing details be retained or added, including the following:</p> <ul style="list-style-type: none"> • Retain the sill plate gasket requirement for durability and air sealing purposes. • Retain the requirement for a continuous top plate or blocking. • Add a requirement to seal rim/band joist connections. • Add a requirement for backdraft dampers on bath/laundry fans and kitchen exhaust fans. 	<p>The EPA appreciates commenters’ proposals to retain or add specific details but will not be adopting them at this time.</p> <p>It is agreed a gasket separating sill plates from concrete or masonry foundations can improve both the air tightness and durability of a home. However, in the context of the ENERGY STAR program, the primary purpose of this detail is to reduce air leakage. Given that this requirement, when missed, creates an impediment to certification and that homes can achieve a low overall leakage rate without it, the EPA still believes it is appropriate to remove it as a mandatory measure. There are many best practices that are not mandatory, and partners are encouraged to adopt them above and beyond the minimum program requirements.</p> <p>The EPA also does not disagree that the requirement for a continuous top plate or blocking is valuable for reinforcing the concept of a six-sided air barrier and addressing the less frequent condition where a wall cavity does not terminate with a top plate. However, with the addition of an infiltration backstop, it is possible to streamline the checklist to the most impactful and common air sealing details.</p> <p>Lastly, the EPA agrees that sealing the connections between rim / band joists and adjacent top plates and sub-floors can meaningfully reduce air leakage. This is also true</p>

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		<p>of backdraft dampers for exhaust fans. These suggestions have been noted for possible inclusion in a future version of the program and are recommended as best-practices as partners design homes to meet the new infiltration backstop.</p>
	<p>Other respondents suggested further streamlining of the mandatory requirements, or alternatives to them, including the following:</p> <ul style="list-style-type: none"> • Eliminate the requirement for drywall to be sealed to top plates because it was claimed that it is difficult for the Rater to verify and because sealing from the attic side is unnecessarily dangerous. • Reference code air sealing details rather than maintain a program-specific list. • Reduce or eliminate air sealing details for homes that achieve a more stringent air leakage rate. • Develop an option to use infrared thermography in lieu of a visual inspection for builders with a history of successfully certifying homes. 	<p>The EPA also appreciates commenters’ proposals to further streamline the checklist, but will not be adopting them at this time.</p> <p>The EPA intends to retain the requirement for drywall to be sealed to top plates because research has found it to be one of the most impactful areas to air seal. An allowance for builder verification is provided for a limited number of details, including this one, in cases where Raters are unable to complete the visual inspection themselves.</p> <p>The EPA believes that listing mandatory air-sealing measures within the program checklists themselves, rather than requiring Raters to cross-reference an external reference, improves clarity, consistency, and quality assurance.</p> <p>Further, the EPA believes that homes that achieve leakage rates substantially better than the applicable limit will likely incorporate the mandatory details, plus adopt additional ones, to achieve low leakage rates such that there would be little value in waiving them. However, the EPA is amenable to exploring this further in the future.</p> <p>Lastly, at this time, the EPA has not identified any protocols that are as effective at verifying compliance with program requirements as visual inspections, including infrared thermography, but is open to reevaluating inspection protocols as new technologies emerge.</p>
	<p>Nearly all commenters were supportive of the proposal to add a mandatory infiltration ‘backstop,’ though some suggested different limits than what was proposed, including the following:</p> <ul style="list-style-type: none"> • An increased limit of 5 ACH50, rather than 4 ACH50, for homes in Climate Zone 2 and homes with fire sprinkler systems. • A more stringent limit that aligns with the prescriptive path of code, with specific suggestions of 2.0, 2.5, 3.0, and 4.0 ACH50. 	<p>The EPA believes that the maximum air leakage rates proposed for the SFNH program are achievable in all homes with sufficient planning and will proceed as proposed. Overall, pairing the streamlined mandatory air sealing details with the new air leakage limits will result in certified homes that are tighter and more consistently air-sealed.</p> <p>The feasibility of these limits is reinforced by data on ENERGY STAR certified single-family new homes with a confirmed rating. In 2023, approximately 85% of all such homes achieved the less stringent limit of 4.5 ACH50 proposed for most program versions, while approximately 70% of all such homes achieved the more stringent limit of 4.0 ACH50 proposed for SFNH National Version 3.2 and California Version 3.4.</p> <p>Based on this data, the EPA believes that proper implementation of its mandatory air-sealing details will result in homes meeting the proposed backstop levels, and no specific reason was provided for why that would not be the case in Climate Zone 2. While the EPA acknowledges that fire sprinkler systems may result in increased leakage, it nevertheless expects that partners will be able to achieve the limit of 4.0 or 4.5 ACH50 with proper planning and attention to sealing the remainder of the envelope. At the same time, it believes that more stringent limits between 2.0 and 3.0 ACH50 would be unduly burdensome to propose as part of a program revision, though it will consider more stringent limits as future versions of the program are developed. For these reasons, the infiltration backstop levels will be adopted as proposed.</p>

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<p>Several commenters provided feedback regarding the proposed alternative metric based on enclosure area:</p> <ul style="list-style-type: none"> • One commenter suggested constraining the use of this metric to attached homes only, rather than also allowing it to be used on certain detached homes. • One commenter suggested expanding the use of this metric to all homes. • Two respondents suggested requiring the use of this metric for homes larger than 5,000 square feet. 	<p>To clarify, the use of the alternative metric has been limited to attached homes, with the one exception of detached homes with $\leq 1,500$ square feet of conditioned floor area. Anecdotally, such homes have more difficulty achieving the same ACH50 limit as larger detached homes due to their increased ratio of enclosure area to volume. Therefore, the EPA believes that the use of the enclosure-based metric for this house type is appropriate.</p> <p>In contrast, the EPA does not believe that the benefit of expanding the use of the enclosure-based metric to all homes would outweigh the added complexity. In such a scenario, a more stringent limit than 0.30 would have to be defined for those structures, resulting in two metrics (i.e., ACH50 and CFM50 per square foot of enclosure area) with two limits for each metric (i.e., one for ‘regular’ homes and one for small or attached homes) for each version of our program (e.g., v3.1 and v3.2). Rather, the EPA believes that the ACH50 metric, overall, is effective and easily understood by program partners and will tailor the use of the alternative 0.30 CFM50 per square foot of enclosure area metric to situations for which it is best suited (i.e., attached homes and small detached homes).</p>
<p>Other feedback provided on this topic included the following:</p> <ul style="list-style-type: none"> • A suggestion to add a test of the air barrier between a house and its garage, as is required by the EPA Indoor AirPLUS program. • A suggestion to require supply-only or balanced ventilation systems, as well as dehumidification, in humid climates prior to imposing air leakage limits. 	<p>The EPA thanks commenters for these suggestions. It agrees that verifying the integrity of the air barrier between a house and its garage is valuable but believes that it is most appropriate for the EPA’s Indoor AirPLUS program. It also views supply-side and balanced ventilation systems, as well as dehumidification systems, as valuable features in humid climates but does not believe that the relatively lenient infiltration backstop that has been proposed necessitates new mandatory requirements. However, such features may be considered in future versions of the program.</p>
<p><i>Narrow scope of builder-verified items</i></p>	
<p>Commenters were almost uniformly supportive of the proposal to classify each checklist item as one that cannot be builder-verified, one that can be partially builder-verified, or one that can be fully builder-verified.</p> <p>Twenty-one commenters agreed with the proposal, noting that it would bring improved clarity to the program.</p> <p>Three commenters suggested going even further and eliminating builder-verified items altogether or, alternatively, integrating any allowances into ANSI / RESNET / ICC 301 or into remote inspection protocols defined by Home Certification Organizations.</p> <p>Two commenters disagreed with the proposal, with one suggesting that builders be able to verify any item to maximize program flexibility.</p>	<p>The EPA appreciates the robust feedback on this topic and will proceed with the proposal to classify each checklist item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified.</p> <p>Providing a limited number of allowances for builder verification is a long-standing pragmatic approach to address details difficult for the Rater to verify during their customary two site visits. With that said, the EPA would be supportive of future efforts to integrate builder verification allowances into ANSI standards or HCO protocols.</p> <p>To improve clarity and enforcement, the tolerances have been changed from “Up to 10%” to one of the following absolute numerical limits, depending on checklist item:</p> <p>For SFNH:</p> <ul style="list-style-type: none"> • “Pre-rock + 50”: Up to 500 square feet of wall areas that have drywall installed prior to general installation of drywall (i.e., “pre-rock” areas such as walls behind tubs or staircases), plus an additional 50 square feet, may be verified by the builder.

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<p>While nearly all commenters were supportive, five requested that the EPA provide more detailed guidance on how the builder-verified allowances are to be used. Specifically, they desired to know how to calculate the acceptable area for items allowed to be partially verified by a builder (e.g., “Up to 10%”). In addition, they requested that the EPA clarify what documentation is necessary in such cases, with three commenters suggesting that all builder-verified items be photo-documented.</p>	<ul style="list-style-type: none"> • “50 sq. ft.”: Up to 50 square feet of area may be verified by the builder. • “5 penetrations”: Up to five penetrations may be verified by the builder. <p>For MFNC:</p> <ul style="list-style-type: none"> • “Pre-rock + 20” – For each dwelling unit, up to 200 square feet of wall areas that have drywall installed prior to general installation of drywall (i.e., “pre-rock” areas such as walls behind tubs or staircases), plus an additional 20 square feet, may be builder verified. In the remainder of the building, up to 500 square feet of wall areas that have drywall installed prior to general installation of drywall, plus an additional 50 square feet, may be builder-verified. • “20 sq. ft.” - Up to 20 square feet of area per dwelling unit and 50 square feet in the remainder of the building may be verified by the builder. • “2 penetrations” - Up to two penetrations per dwelling unit and five in the remainder of the building may be builder-verified. <p>Upon reconsideration, the requirement to air seal rough openings around windows and doors will be required to be Rater verified and will not be eligible for builder verification. With this change, builder verification of air sealing checklist items will be limited to details that are known to be challenging for Raters to fully inspect due to access or construction sequencing (e.g., recessed light fixtures that can’t be reached, sealant between drywall and top plates that is not visible after installation).</p> <p>At this time the EPA is not formally requiring builders to send photographs because it anticipates pragmatic challenges with implementing and enforcing such a requirement in 100% of cases. However, note that the use of builder verification is at the Rater’s discretion, and Raters should take steps to gain confidence that builder-verified items are being consistently installed, which may include providing trades training, spot-checking examples on a rolling basis, and requesting photographs from a builder. Further guidance on best practices for using builder-verified items is available in this Technical Bulletin.</p>
<p>Twenty-two commenters agreed it was appropriate to reduce the total allotment of builder-verified items from eight to five. Two commenters noted that builder-verified items are rarely used on homes they certify. One rater reinforced that these items should be primarily third-party verified.</p> <p>One commenter suggested five was not low enough and that all builder-verified allowances should be eliminated. Another commenter suggested that the EPA should consider requiring a third inspection prior to the installation of insulation to minimize the need for builder-verified items.</p> <p>In contrast, two commenters disagreed that the allotment should be reduced from eight, with one stating that the change was not justified by the EPA.</p>	<p>The EPA will proceed with the proposal to reduce the allotment of builder-verified items from eight to five, as supported by nearly all commenters. The justification for fewer allowances is the elimination of several mandatory thermal enclosure details that had frequently required builder verification (e.g., elimination of the requirement for sill seal gaskets, insulated recessed light fixtures in certain ceiling assemblies, continuous top plates, advanced framing details in above-grade walls).</p> <p>While a third site visit can help minimize the need to rely upon builder verification, the EPA does not believe that a mandatory additional inspection is warranted at this time. However, the EPA agrees that the ideal is for all requirements to be third-party verified in every home and will continue to work towards this goal in future iterations of the program. It also notes that the use of builder verification is at the Rater’s discretion, and Raters are within their rights to insist on a third inspection if they believe it is warranted by circumstances.</p>

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<p>Eighteen commenters agreed that Raters can verify the air sealing of fire-rated area separation walls. Two commenters were unsure. In contrast, five commenters were of the belief that this can be difficult to inspect in some instances during a Rater’s standard two site inspections. They suggested that this item should be eligible for builder verification. Lastly, one commenter noted that other strategies besides shaft-liner systems may be used for the area separation wall, which may make inspection of this detail more difficult.</p> <p>Separately, two commenters agreed that an inspection was warranted, but suggested that an exemption from this item should be permitted in cases where the Authority Having Jurisdiction prohibits air sealing (e.g., due to fire safety concerns). One suggested potentially pairing an exemption with a requirement to use an advanced whole-dwelling air sealing technique (e.g., Aerobarrier).</p>	<p>The EPA appreciates the feedback provided on this topic. In response to the concern that Raters may not always be able to inspect the fire-rated area separation wall, full builder verification of this item will be allowed.</p> <p>Regarding potential code conflicts, Footnote 3 of the National Rater Field Checklist already clarifies that the “N/A” column should be used when the checklist item conflicts with local requirements. Use of this column would be appropriate in a home where the Authority Having Jurisdiction does not permit the fire-rated area separation wall to be sealed. Note, however, that the infiltration backstop for attached housing would still be required to be met in such an instance.</p>
<p>Regarding feedback on specific items:</p> <ul style="list-style-type: none"> • One commenter suggested allowing builder verification of the performance of all fenestration, or at least of skylights and other fenestration that is not easily accessible. They note that NFRC stickers for such products may be removed at the time of installation, prior to Rater-verification, because of their inaccessibility. • One commenter suggested that gasketing of attic access panels, drop-down stairs, whole-house fans, and doors should be allowed to be builder-verified because gaskets may not be installed at the time of inspection due to painting operations. 	<p>The EPA does not believe that an allowance for builder verification of fenestration is necessary. Note that ANSI / RESNET / ICC 301 provides a variety of methods for verifying fenestration performance beyond an inspection of the NFRC label (which can be reordered from the manufacturer), including the NFRC directory and the manufacturer’s datasheet.</p> <p>Regarding gaskets, Rater verification of these items provides the greatest confidence that this detail has not been overlooked, particularly for gaskets that are field-installed (e.g., attic access panels) rather than factory-installed (e.g., pre-hung exterior doors). While the EPA appreciates the challenge cited by the commenter and acknowledges that adjustments to sequencing or scheduling may be required in some cases, the EPA ultimately believes third-party verification of gaskets is warranted for the sake of uniform enforcement.</p>
<p><i>Transition to Track A: HVAC Grading and sunset Track B</i></p>	
<p>Thirteen commenters agreed that it is appropriate to sunset Track B and require the first three tasks of Track A to be completed, though some noted that this may result in a short-term and / or long-term increase in the cost of a rating. Seven of these commenters thought that there was no value in maintaining Track B.</p> <p>In contrast, eighteen commenters believed it is premature to sunset Track B, with three stating that this should only be done once Raters are able to complete all five tasks in Track A. One commenter specifically expressed concern that Raters may not be consistently completing HVAC design</p>	<p>The EPA appreciates the extensive feedback provided on this proposal. While a growing number of partners have successfully implemented Track A, it is apparent that many other partners have not done so for a variety of reasons. At this time, the EPA will not proceed with the proposal and will instead preserve Track B as is. As a result, partners will continue to have two tracks to choose from that result in certification.</p> <p>With that said, the EPA continues to believe that Track A is superior – it is the only track that provides third-party verification; is based upon the industry standard, which is continuously improved; and rewards proper installation with ERI points. The EPA will continue to enhance ANSI / RESNET / ACCA / ICC 310 based on partner feedback, build the capacity of Raters to implement Track A, and encourage the implementation of the</p>

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reviews and suggested that the EPA should better assess the capability of Raters to complete Track A prior to mandating its use. One commenter suggested that Track A should be sunset instead.

Commenters reported a variety of perceived benefits to Track B, including the following:

- Six commenters stated that preserving Track B reduces liability for Raters with regards to safety and insurance costs. They also noted that some jurisdictions limit what testing Raters can complete, given that most do not have an HVAC contractor license.
- Five commenters added that Track B may allow for a lower cost of certification or less frequent certification delays because re-inspections are less likely.
- Ten commenters expressed the belief that contractors or Functional Testing Agents (for MFNC) are better suited than Raters to assess the installation quality of the systems they install and, therefore, Track B is more likely than Track A to result in proper installation. Two commenters added that Track B provides a stronger incentive than Track A for contractors to properly install their systems.
- Eight commenters stated that the flexibility of having two tracks that result in certification is helpful, particularly in markets where Raters have not yet begun offering verification services aligned with Track A.
- Two commenters stated that Track B has benefited from HQUITO's directly overseeing contractor companies (not just the quality of the systems they install). They believed that this has helped to ensure compliance with program requirements and eliminated under-performing HVAC contractors.
- One commenter stated that Track B may result in higher verified savings per home, higher likelihood of installations matching manufacturer recommendations, and greater engagement with manufacturers to provide tools and training that support proper installation.
- One commenter believed that Track B has increased the level of accountability for the HVAC industry but

frameworks within the standard that would permit on-board diagnostics and independent verification reports to be employed.

As part of next year's annual revision, the EPA may revisit this topic and propose more incremental steps that foster the adoption of Track A. Longer-term, the EPA will revisit the possibility of sunseting Track B once the adoption of Track A has increased.

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	<p>has created challenges with document collection and true verification of installation quality.</p> <ul style="list-style-type: none"> • One commenter thought Track B provided an easier pathway to certification for homes with mini-/multi-split systems because such systems are exempted from many of the requirements within the track. • One commenter noted that Track B may allow for a less complicated certification process where the testing in Track B is required within code. • One commenter stated that in combination with duct testing, Track B is sufficient to ensure a quality HVAC installation by requiring a comprehensive report and credentialing of the contractor. They also noted the refrigerant charge test by the contractor is more appropriate than the test in Track A, and Track A can cause an adversarial situation between the HVAC contractor and Rater. • One commenter noted that Track B may allow for a lower cost of certification because it does not require additional Rater credentials to be obtained. 	
	<p>If the EPA were to proceed with the proposed sunset of Track B, nineteen commenters believed that the proposed transition date of 1/1/2026 would provide sufficient time to prepare, with the understanding that only Task 3 would be brand new.</p> <p>In contrast, nine commenters thought that the proposed timeline would not be adequate.</p> <p>One commenter was unsure.</p> <p>One commenter believed the length of the transition period should be dependent on whether Raters would be expected to complete HCO training on the entirety of ANSI / RESNET / ACCA / ICC 310 (Standard 310 - the HVAC grading standard) or just on Task 1 through 3.</p> <p>One commenter believed that the transition date was adequate for the Single-Family New Homes program but that additional time would be needed for the Multifamily New Construction program.</p>	<p>As noted above, the EPA will not proceed with the proposal and will instead preserve Track B. Therefore, the proposed transition date is no longer applicable.</p>
	<p>The EPA proposed to only require Tasks 1 through 3 of Standard 310 to be completed for a home or dwelling unit to be eligible for certification but solicited feedback as to whether Task 4 (measurement of blower fan watt draw) and</p>	<p>The EPA appreciates the feedback on this topic, which generally affirms that Tasks 4 and 5 are valuable but more challenging to complete than Tasks 1 through 3. As noted above, the EPA will not proceed with the proposal and will instead preserve Track B. Given that</p>

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<p>Task 5 (assessment of refrigerant charge) should also be required in the next program revision.</p> <p>Fifteen commenters agreed that these tasks should remain optional for now. Several affirmed that these two tasks are more challenging to complete than the first three in Standard 310. One commenter noted that the ERI credit associated with them will incentivize their use, even if not mandatory.</p> <p>In contrast, eight commenters believed that all five tasks should be required, so as to fully assess installation quality per Standard 310. Two additional commenters believed that Task 5 should be required, but not Task 4, while one additional commenter believed that both tasks should be required just for heat pumps.</p> <p>One commenter added that if these tasks are not made mandatory at this time, then active efforts should be made to prepare Raters to implement them in the future.</p>	<p>the program will continue to offer two tracks that result in certification, for homes using Track A, all five tasks will continue to be required.</p>
<p>Several individuals suggested ways to strengthen Track A and Track B, including the following:</p> <ul style="list-style-type: none"> • One commenter recommended that the EPA tighten its requirements for Track A to Grade I airflow, whereas currently a home is permitted to be certified with Grade II. • Two commenters suggested that Track B should be strengthened by requiring that contractors use 'smart' tools to collect robust field data that could be used to assign installation grades. • One commenter suggested updating Track B to require that the contractors complete Tasks 3 through 5 of Standard 310. Another commenter suggested adding just Task 3 of Standard 310 to Track B. • Two commenters suggested reintroducing the requirement that the contractor provide the completed National HVAC Commissioning Checklist to the Rater. • One commenter suggested strengthening Track B by implementing the use of Independent Verification Reports, a concept contained in Standard 310 in which an entity would oversee contractors who would use "smart" tools to collect robust commissioning data and issue system-level reports with installation grades. 	<p>The EPA appreciates the suggestions for improving Track A and B. Tightening the tolerances allowed under Track A will be considered as adoption increases and more data are collected regarding the grades being achieved. For MFNC, improvements to Section 6 of the National HVAC Functional Testing Checklist will be considered as well.</p> <p>In contrast, the EPA does not intend to significantly update the requirements under Track B, preferring to invest resources in building capacity to complete Track A. It is worth noting that the concept of Individual Verification Reports, which one commenter suggested implementing as part of Track B, is embedded within Standard 310. Therefore, if a program was established to implement this concept, it would become one avenue for demonstrating compliance with Track A.</p>

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	<ul style="list-style-type: none"> • One commenter suggested strengthening Track B by increasing the rigor of the credentialing process. • One commenter suggested improving the MFNC National HVAC Functional Testing Checklist by clarifying for which system types Section 3 is required for, collecting balancing report data instead of pressures in Section 3, removing Section 4, and allowing a report and photos to be sufficient in lieu of site visits for functional testing of VRFs in Section 6. 	
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Sunset the Water Management System Builder Requirements

	<p>Twenty-two commenters agreed that it was appropriate to sunset the Water Management System Builder Requirements, while four commenters dissented, and one was unsure.</p> <p>Among those supporting the proposal, nine commenters believed that there were no significant benefits to maintaining the Water Management System Builder Requirements. One of these commenters suggested that builders themselves are best suited to define what water management details are necessary for their homes, rather than the EPA.</p> <p>Individual commenters suggested that many builders already implement these measures because they understand the importance of controlling bulk moisture or because code requires them to do so. Three commenters suggested that proceeding with the sunset was appropriate because Raters are not required to independently verify that the requirements have been met. Two commenters were satisfied with the proposal, given that the details will continue to be required by the EPA's Indoor AirPLUS program.</p> <p>Among those who disagreed with the proposal, six commenters believed that the requirements do offer improved durability and quality. One commenter suggested that the requirements increase the likelihood that these details will be included in certified homes, above and beyond code, with one noting that some builders may lack the knowledge to implement these requirements if they are not part of the program. Several commenters expressed the belief that small builders, builders new to the program, and markets with lax code enforcement benefit the most.</p>	<p>After consideration of the feedback provided by stakeholders, the EPA will proceed with the proposal to sunset the SFNH Water Management System Builder Requirements and the MFNC Water Management System Requirements.</p> <p>While the value of the water management system details is recognized, the EPA believes that the quality control of the ENERGY STAR Single-Family New Homes and Multifamily New Construction programs will benefit by limiting their requirements to those that are third-party verified, with limited exceptions. Several commenters suggested that the oversight of the requirements should instead be enhanced. However, the EPA notes that it proposed Rater verification of these requirements as part of the original proposal for Version 3.0 of the ENERGY STAR Single-Family New Homes program and stakeholders strenuously objected to that proposal.</p> <p>While no longer maintained as part of the ENERGY STAR program, these requirements will be archived and available to builders or other entities, such as utilities, which may choose to continue implementing them. Additional guidance on these details remains available in the Building America Solutions Center. Furthermore, water management requirements will continue to be maintained and enhanced as part of the EPA's Indoor AirPLUS program.</p>
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<p>Two commenters proposed increasing the required oversight for these requirements (e.g., Rater verification or submittal of the builder-completed checklist).</p> <p>Finally, one commenter noted the benefit to partners of having a consolidated list of requirements and another commenter requested that the EPA develop a builder guide with best practices on this topic, even if the proposal proceeds.</p> <p>One commenter was unsure, mirroring the views of both the supporters and detractors of the proposal.</p>	
<p>Other feedback provided on this topic included a proposal from one commenter to merge the ENERGY STAR and Indoor AirPLUS programs.</p>	<p>The EPA believes that its ENERGY STAR and Indoor AirPLUS programs offer distinct value to the residential new construction market, with homes and apartments certified to each program deserving unique recognition. With that said, partners are encouraged to pursue certification under both programs to accrue their complimentary benefits.</p>

Additional proposals specific to MFNC Revision 05

Limit townhouse eligibility to Single-Family New Homes

<p>Six commenters agreed that it was appropriate to make townhouses eligible for certification exclusively through the ENERGY STAR Single-Family New Homes (SFNH) program, while two commenters disagreed, and one did not specify an opinion.</p> <p>Among those supporting the proposal to limit townhouse eligibility to SFNH, one noted that it will reduce confusion, one noted it would simplify the program, two noted that townhouses fit under the categorical umbrella of “single-family” dwellings, and one noted their existing practice of certifying townhouses using the SFNH program.</p> <p>The two commenters who disagreed with the proposal noted that there are projects where townhouses are attached to other multifamily buildings, including attached structures with two stacked dwelling units (such as those commonly referred to as “2-over-2s”). One suggested that where the townhouses share mechanical/electric/plumbing services with the multifamily buildings they should be able to follow the same program and the other suggested that attached two-unit structures be allowed to use the SFNH program to keep all dwelling units in the same program.</p>	<p>The EPA will proceed with the proposal to make townhouses eligible for certification exclusively through the ENERGY STAR Single-Family New Homes program and is not adjusting the eligibility classifications for other types of buildings at this time.</p> <p>The EPA acknowledges that this will require townhouses to be in a separate program from multifamily buildings that may be part of the same development. The extra effort to manage two sets of program documents is partially offset by the fact that, compared to MFNC, SFNH’s checklists are shorter because they are targeted to the features likely to be applicable in townhouses. This will also allow removing many redundant townhouse-specific requirements from the MFNC checklists, reducing complexity and overhead for all other MFNC users.</p> <p>The EPA also believes that siloing townhouses in SFNH will most clearly communicate which program requirements and schedules apply to townhouses, especially as the SFNH and MFNC Version implementation timelines diverge.</p> <p>Regarding units sharing a mechanical system, the MFNC Program Requirements already specify that such units are considered part of the same “building,” which makes it a multifamily building and not a townhouse (because townhouses are defined as having a single dwelling unit). Therefore, the expectation is and remains that dwelling units sharing a mechanical system use the same program, and that program is MFNC.</p> <p>Attached two-unit structures will remain eligible for the MFNC program exclusively, to align with the classification of such structures under the International Building Code, rather than International Residential Code, EPA will continue to align program</p>
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	<p>One commenter did not include an opinion on the proposal but noted that the only benefit for having townhouses in MFNC is to streamline the process for projects that include a mix of townhouses and multifamily buildings.</p>	<p>requirements across the SFNH and MFNC programs to simplify implementation in cases where both programs are used on different buildings in a development.</p>
	<p>Many commenters also noted confusion with, or suggested adjustments to, the definition of townhouse. One commenter suggested that townhouse needs to be rigorously defined. Another organization suggested that two-unit attached buildings and buildings without common spaces be considered townhouses. That same commenter suggested aligning with the USGBC definition of townhouses. Another commenter suggested aligning the definition with other programs including LEED, code, ERI, HERS, and NGBS.</p>	<p>The EPA appreciates commenters proposals to adjust the definition of townhouse to include additional building types but notes that the MFNC Program Requirements already includes the following definition: “A ‘townhouse’, as defined by ANSI / RESNET / ICC 301, is a single-family dwelling unit constructed in a group of three or more attached units in which each unit extends from the foundation to roof and with open space on at least two sides.” Notably, townhouses are distinguished from “4-story two-unit structures (commonly referred to as “2-over-2s”),” which has historically been raised as a point of confusion.</p> <p>The definition of townhouse currently is aligned with the definition from ANSI / RESNET / ICC 301, the ICC codes and the DOE Zero Energy Ready Home program, and the EPA believes it is important to remain consistent with these standards and programs. For this reason, the EPA will not be changing the townhouse definition at this time.</p>

Require MFNC Workbook for all buildings

	<p>Eight commenters agreed with the proposal; however, three of those commenters noted that adjustments to the Multifamily Workbook were needed to accommodate the ERI Path. One commenter noted that consolidating information in one document will be easier for Raters and quality control reviewers and using a standard template will improve consistency. One noted that the Multifamily Workbook is useful, especially for common areas, and that they are already using it as a matter of internal policy. Another suggested that this could require adjustments to contracts where additional scope of work would be required to complete this documentation.</p> <p>Regarding using and adjusting the Multifamily workbook to be used for the ERI Path, commenters said the following:</p> <ul style="list-style-type: none"> • One commenter noted that the Multifamily Workbook needs to have clear directions for the ERI Path. • One noted that the Multifamily Workbook needs to be consolidated so that it is not redundant for the ERI Path, otherwise it will just be extra work. • One commenter suggested that EPA create an ERI specific training on the Multifamily Workbook. • One commenter recommended allowing ComCheck or ResCheck for envelope compliance. 	<p>The EPA will proceed with the proposal to require the Multifamily Workbook for all buildings, including those on the ERI Path. The EPA will edit the Multifamily Workbook to add explicit instructions for the ERI Path and avoid duplicating data already in the energy model. The main function of the Multifamily Workbook for the ERI Path will be to document common spaces and, where applicable, building-level thermal envelope UA calculations.</p> <p>At this time, ResCheck and ComCheck do not fully calculate compliance with the ENERGY STAR thermal backstop for all buildings. If that functionality is added to those tools in the future, the EPA expects it would recognize such reports as an alternative compliance option. Additionally, the EPA will consider whether some buildings could use current versions of these tools to fully demonstrate compliance.</p> <p>The EPA appreciates commenters feedback regarding the potential for extra effort to complete the Multifamily Workbook, especially where this information is documented through other systems, as well as concerns about innovative methods for data collection. We recognize there may be additional ways to collect this data and are open to proposals from HCOs for alternative data collection methods that they are able to review. EPA will also work with HCOs and MROs to assess whether to include any components of the QA checklists within the Multifamily Workbook.</p> <p>The EPA appreciates the feedback on additional specific adjustments to the Multifamily Workbook and these will be considered individually as the document is updated.</p>
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<ul style="list-style-type: none"> • One commenter recommended multiple adjustments to the envelope compliance tab including: <ul style="list-style-type: none"> ○ Allowing dwelling unit levels to be used for common spaces as well in the Workbook to reduce data entry. ○ Allowing a worst-case U-factor for an assembly to cover multiple similar types. ○ Allowing area take-offs provided by the Architect to be used by the Rater. ○ Guidance on whether commercial/retail envelope spaces should be included. • One commenter suggested making instructions more visible, such as the option to provide an AHRI certificate in lieu of data entry into the Multifamily Workbook table. • One commenter suggested having a separate dropdown selection for common areas. • One commenter suggested adding QA checklists to the Multifamily Workbook with data pre-populated. <p>Four commenters disagreed with the proposal. Three noted that it may add significant time to a project. Three noted that Raters may have their own tools to use currently and switching to the Multifamily Workbook for the ERI Path would create additional work for the Rater and therefore cost for the builder. Two commenters suggested that using the Multifamily Workbook could reduce innovation on data collection and documentation such as the development of mobile applications. One suggested that the Multifamily Workbook be able to be customized to work with other processes. Another commenter recommended a comprehensive Workbook for ENERGY STAR, IAP and ZERH, as well as QA checkboxes for HCO staff performing QA. One commenter suggested that everything that is input to the Multifamily Workbook was already being documented, so the Multifamily Workbook is not needed.</p>	
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Streamline insulation and reduced thermal bridging details

<p>In addition to the responses noted above for the proposal to eliminate the thermal bridging details in SFNH, nine commenters were supportive of the proposal for MFNC to replace some of the mandatory thermal bridging details (and associated exemptions) with a requirement to accurately assess them per ANSI / RESNET / ICC 301. One</p>	<p>As noted above, the EPA will proceed with the proposal to convert some of the mandatory thermal bridging details in MFNC with a requirement to accurately assess them per ANSI / RESNET / ICC 301. The expectation is that partners will continue to incorporate these low-cost commonsense details wherever practical, given that they will help achieve both the ENERGY STAR performance target and the thermal enclosure “UA” value, which is the area-weighted U-factor of the enclosure. The fact that a subset of buildings will forego some details is no different than today, considering the multiple exemptions that have</p>
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<p>commenter was concerned about an increase in cost associated with documenting the insulation levels.</p> <p>Regarding feedback on specific details:</p> <ul style="list-style-type: none"> • Two commenters noted that enabling flexibility would increase participation. One suggested that slab edge insulation flexibility will be particularly impactful on participation with a limited impact on overall thermal performance given that many buildings would only reduce insulation levels for a very limited portion of the slab edge. • One commenter was concerned that eliminating the slab insulation in cold climates could lead to cold floors or condensation issues and suggested a requirement for 90% slab edge insulation. • One commenter noted that flexibility for slab edge insulation will avoid potential warranty issues. • One commenter suggested considering the impact of thermal bridging through cladding attachment systems. • One commenter suggested ensuring there is no penalty in buildings where applicable conditions (e.g., attic access platforms) do not exist. • One commenter noted that assessing concrete floor edges would increase complexity. • Three commenters requested additional training and guidance for Raters on how to model, evaluate, and document these details, as well as for QADs on how to review compliance. 	<p>been integrated into the program requirements. This change will result in a simpler and more accommodating program, while achieving the same overarching goals of delivering efficient buildings with high-performing enclosures.</p> <p>To address the commenter’s example, no penalty would be incurred in the UA target calculation if an attic access platform were not present. In fact, the absence of an access platform would be a benefit because it would allow space for the full insulation thickness, which would improve the building’s overall UA performance.</p> <p>The EPA notes that, because current program requires an assessment of the insulation at the concrete floor edge already, this policy does not increase the level of effort to assess insulation levels.</p> <p>The EPA acknowledges that additional training and guidance on these details will be beneficial in promoting their adoption and consistent assessment by Raters. It intends to invest in these resources in the year ahead.</p>
<p>The EPA also proposed making the “UA” (the area-weighted U-factor calculation) approach the exclusive option to demonstrate compliance with the thermal backstop and removing the option for a component-by-component prescriptive approach.</p> <p>Two commenters noted that this proposal would require areas to be documented for all building components, which could increase costs to comply with the program.</p>	<p>The EPA will proceed with the change to make the “UA” the default compliance method to assess the thermal performance of the building. This aligns with the SFNH program and verification within ERI software.</p> <p>However, given partner feedback, the option to demonstrate that each individual component meets the nominally required U-factor will be retained as an alternative within a Footnote and the Multifamily Workbook. This will avoid the need to calculate component surface areas in the subset of buildings that are able to satisfy this approach. Nevertheless, the EPA expects that most project teams will prefer to use the “UA” approach for its added flexibility.</p>

Transition to Track A: HVAC Grading by Rater and sunset Track B

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<p>In addition to the responses noted above for the proposal to Transition to Track A, specific to the Multifamily New Construction program, multiple commenters had feedback on the proposed airflow test requirements and duct leakage test requirements for common spaces. Three commenters agreed that the proposed airflow and duct leakage testing were achievable in common spaces.</p> <p>In contrast, three commenters disagreed with the duct leakage testing, noting that some common area systems are installed in high ceilings/hard-to-reach areas or have complex long runs where it would be challenging to test. One also noted that calculating the leakage for these spaces will be challenging for Raters, given that the referenced standards for this test and the established leakage allowances are for dwelling units. One commenter stated the testing would increase the time and scope complexity for the Rater. One commenter suggested an exemption for these systems, while another suggested allowing for witnessing the test or only requiring testing on ducts outside of conditioned spaces. One noted that these systems are mostly in conditioned spaces and therefore there will be limited energy savings and suggested proper sizing of equipment is more impactful.</p> <p>Three commenters also disagreed with the proposed airflow testing. One commenter recommended that TAB contractors be allowed to test the airflow rates for common spaces, one commenter noted that large return grille areas may be hard to test with a flow hood, and one commenter noted there would be a high learning curve for Raters.</p>	<p>As noted above, the EPA will not proceed with the proposal and will instead preserve Track B. Therefore, the proposed airflow testing and duct testing for common spaces will not be required at this time. As part of continuing to improve Track A, in the next annual revision the EPA may revisit the inclusion of these tests as a component of Track A.</p>
<p>Two commenters suggested more clarification on what “rough-in” vs. “final” conditions are for duct testing, including the requirement for registers or grilles to be installed, and suggested aligning with the ANSI 380 Standard.</p>	<p>The EPA appreciates the feedback on the duct testing requirements and will consider adjustments in the annual revision process.</p>
<p><i>Streamline mandatory lighting requirements</i></p>	
<p>Eight commenters agreed that it was appropriate to streamline the lighting requirements and require 90% LEDs in common spaces with no alternative to use Lighting Power Densities (LPDS). No commenters disagreed.</p>	<p>The EPA will proceed with requiring 90% LEDs in common spaces and removing alternatives and duplicative requirements.</p> <p>The EPA recognizes the need for streamlined documentation. Previously ASHRAE Path buildings only documented lighting in the ASHRAE Path Calculator or the ASHRAE Standard 90.1 Performance Based Compliance Form (Compliance Form). The</p>

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	<p>Regarding feedback on specific items:</p> <ul style="list-style-type: none"> • Two commenters noted that LEDs are widely available. • One commenter noted that this would simplify the process for Raters. • One commenter noted that documentation in the Workbook and the ASHRAE Standard 90.1 Performance Based Compliance Form may be duplicative and EPA should not require room by room counts in both documents. 	<p>Compliance Form does not currently document whether the fixture is LED. The EPA will look to minimize the additional effort needed to document this requirement for the ASHRAE Path in the Multifamily Workbook.</p>
<p><i>Consolidate ASHRAE Path performance target & documentation and add a fuel-neutral approach</i></p>		
	<p>Seven commenters agreed with the proposal to consolidate the ASHRAE Path performance target and documentation as well as add a fuel-neutral approach. Of those, one noted that it supported the change since it would keep the MFNC requirements stringent and improve new construction buildings; while another noted that it helps to have a national target, but it may be a big step for areas with less stringent codes. One commenter did not agree or disagree with the proposal but noted that the ASHRAE Standard 90.1 Performance-Based Compliance Form does not currently import data from the software they use.</p> <p>Regarding feedback on specific items:</p> <ul style="list-style-type: none"> • One commenter recommended the fuel-neutral approach be required, not just included as an option. • In contrast, another commenter supported the proposal that the fuel-neutral approach should be added as an option, not a requirement for all projects. 	<p>With recognition of the support from commenters, the EPA will proceed with the proposal to consolidate the ASHRAE Path performance target and documentation and add a fuel-neutral approach. All ASHRAE Path buildings will need to use the ASHRAE Standard 90.1 Performance Based Compliance Form (Compliance Form) and ENERGY STAR MFNC / ZERH Companion Tool.</p> <p>At this time, the fuel-neutral approach will be added as an option but not a requirement. Over time, the EPA will evaluate the approach and whether to require it as an exclusive approach in the future.</p> <p>The EPA recognizes that not all software supports the Compliance Form. However, the Compliance Form has broader support for software than the ASHRAE Path Calculators it replaces. The Compliance Form is maintained by DOE and new software can be added with the support of software vendors. Respondents are encouraged to reach out to their software vendors to ask them to add support for the Compliance Form.</p>
	<p>Other feedback provided included the following:</p> <ul style="list-style-type: none"> • Two commenters suggested EPA use lower site-to-source conversions. One of those noted that the EPA should use a future-looking carbon profile (e.g., using a tool such as Cambium) for source energy calculations rather than the current ratio. • One commenter suggested EPA create more technical training for ASHRAE modelers, including using the Simulation Guidelines. 	<p>The EPA appreciates the additional feedback on the ASHRAE Path.</p> <p>The EPA is introducing the fuel-neutral approach as an alternative to the source energy target, which it expects to be more appropriate and more popular for most electric buildings. While the EPA is declining to modify the source energy target at this time, it will monitor data as projects begin to use the new fuel-neutral approach and may consider eliminating or adjusting the source energy target in the future.</p> <p>The EPA will consider investing in additional training resources for energy modelers as time and resources allow.</p>

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	<ul style="list-style-type: none"> • One commenter suggested that less data should be required in the Multifamily Workbook when using the ASHRAE Path. • One commenter suggested an improved compliance path for Phius Projects. 	<p>With the transition to the Compliance Form, the EPA will work with the Multifamily Review Organizations to determine if there is data that is duplicative with the Multifamily Workbook. Finally, as noted in Policy Record ID 00219 in the Archive ENERGY STAR Multifamily New Construction Policy Record, the EPA will revisit the Phius target when additional data is available.</p>
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Transition to whole-building modeling Path in California

	<p>No comments were received on this proposal.</p>	<p>The EPA will proceed with the change to make the whole-building model the exclusive compliance path for all Versions in California.</p>
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