

Comments Received During the Stakeholder Feedback Period for Revision 05 of the ENERGY STAR Multifamily New Construction Program



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

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Comments Received

Organization Name:

Respondent Last Name: Alfandre

Respondent First Name: Jason

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

[Add Comment]

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

[Add Comment]

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

Currently the workbook is not set up for ERI path approach. If the workbook could be consolidated, limiting redundancy, and refined to be more applicable towards the ERI path, completion of the workbook could be justified

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

Currently raters are able to track rated features in their own format, particularly related to sampling. By making the workbook completion a requirement it adds additional, unfamiliar documentation requirements when using the ERI path

- 3) Do you have any additional feedback on this topic?

If the workbook could be more applicable to the ERI approach, limiting redundancy in the ES rater checklist, I believe the workbook could then be beneficial

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

[Add Comment]

- 2) Do you have feedback on any other specific elements of the proposal?

[Add Comment]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

I do not believe it is appropriate to sunset track B

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

This will put more pressure and responsibility on the raters

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

There will be a big learning curve for airflow testing of units in common space.

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

Yes

- 5) Do you have any feedback on any other specific components of the proposal?



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This will put additional burden on the raters that is currently allowed to be distributed to HVAC installer



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Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

Yes, we support this proposed update.

- 2) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

[Add Comment]

- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

[Add Comment]

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add Comment]

B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]

C) Should we require the fuel neutral approach be used by all buildings?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add Comment]

- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

- 3) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: All star Energy Rater Inc

Respondent Last Name: Opperman

Respondent First Name: Pieter

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

Agreed. However, it would be helpful if the designation "townhouse" were rigorously defined. Various organizations have differing views on this. Would six adjacent homes be considered "townhouses" or "duplexes" or "row homes" or even "condos"? We have seen all these terms employed.

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

[Add Comment]

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

[Add Comment]

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

[Add Comment]

- 3) Do you have any additional feedback on this topic?

[Add Comment]

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

Agreed

- 2) Do you have feedback on any other specific elements of the proposal?

[Add Comment]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

[Add Comment]

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

Strongly disagree with eliminating Track B. In fact, I would propose to eliminate Track A, for the following reasons: Track B requires the HVAC contractor to submit a fairly detailed design, for review by the rater. Track B also requires the HVAC contractor to complete a reasonably comprehensive installation report, which the rater MAY request (and probably should). Track B requires the HVAC contractor to be credentialed – and perhaps those credentials could be more rigorous than filling a form and paying \$1000 per annum. These items are sufficient to ensure the quality of the installation (together with the duct leakage tests). I would also suggest that Track B be enhanced by the addition of the airflow test, then we have the best of both worlds. The "Watt draw" test adds no value whatsoever in my opinion, and the refrigerant charge measurement is rudimentary compared to the tests that the contractor performs on installation. Track A sets up an adversarial situation between HVAC contractor and rater, that will only end in dysfunctional behaviour. Track A, as it currently stands, adds costs and time to the rater's work, and adds very little real value to the homeowner and the builder.

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served



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by residential-sized indoor units?

[Add Comment]

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

We don't do MFNC, but I imagine it would be tricky, with a valueless and academic result.

- 5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]



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Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?
[Add Comment]
- 2) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?
[Add Comment]
- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?
[Add Comment]
- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.
 - A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?
[Add Comment]
 - B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?
[Add Comment]
 - C) Should we require the fuel neutral approach be used by all buildings?
[Add Comment]
 - D) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?
[Add Comment]
- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?
[Add Comment]
- 3) Is the 10% savings target for common spaces when modeled separately reasonable?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]



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Comments Received

Organization Name: Bright Power

Respondent Last Name: Pratt

Respondent First Name: Carmel

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 3) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

[Add Comment]

- 1) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

The only significant benefit is for projects/developments that include a mix of townhouse buildings and stacked multifamily buildings, to keep things streamlined and not have to follow two separate certification programs/contract separately with MRO/HCO

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

Reducing the Workbook load by allowing Com/ResCheck in lieu of the Envelope Tabs could streamline the process. Especially when filling out multiple workbooks for one project. The Workbook makes sense for things like common area ventilation etc.

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

[Add Comment]

- 3) Do you have any additional feedback on this topic?

[Add Comment]

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

Yes, agreed this makes sense generally to consolidate and rely on modeling/backstop, however, what is the process/reference for ASHRAE pathway? This section refers to ANSI 301, which is only applicable to ERI pathway.

- 2) Do you have feedback on any other specific elements of the proposal?

The only caution here is clearly defining what "assess" means and further clarifying how to accurately update as-built models based on field conditions that are "assessed" to be different than proposed design/preliminary energy model.

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

It does not seem like the industry/providers have had enough time to even implement Track A vs. B to know whether it is appropriate. From our standpoint, all of our ESMFNC projects have pursuing Track B, so this is a major shift and change, coming rather quickly for us to implement (based on the multi-year timeline of our projects, we are STILL only now final certifying first few projects through the new ESMFNC program. We've spent a lot of time educating building partners/HVAC teams and developing scope to support the FPT by an FTA, now to only have to shift to ANSI 310 and Rater Testing.)

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

See above. This is particularly challenging for projects that are still trying to grasp and implement Track B. This also presents additional costs, training time, credentialing, etc. to get ANSI 310 Rater designation. Additionally, this seems very heavily biased towards ERI pathway and does not consider ASHRAE path projects that do not benefit from ERI



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points. It's our feeling that there is actually great value on larger ESMFNC projects to have an additional third party FT Agent in addition to an ESMFNC Rater (our firm provides both services and means that there are more eyes and QA/QC on the project, as opposed to one individual owning all of those checks/balances).

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

Yes, they are achievable, but greater clarity/definition must be made to what "rough-in" vs. "final" conditions are. For example, it's counter-intuitive to require registers/grills be installed in all duct terminations at final, when it's actually best and most effective to visually verify air sealing of the duct boot to finished surface WITHOUT registers/grills. Please confirm/clarify alignment with section 5.2.8 in standard 380, which allows new construction buildings to tape the face of duct boots when registers/grilles are not present for final testing. Again, neither 380 nor 310 clearly define what "rough-in" vs. "final" condition is for new construction. The ES checklist was the only place which defined "final" condition via item 6.4.2 as having registers/grilles present. We strongly feel this defeats the purpose of ensuring that duct boots are sealed to the final finished surface. In fact, it is easier and more reliable to inspect and test duct sealing when registers/grilles are not present, allowing to confirm that boots are sealed to the finished surface without spending tons of time removing infinite amount of registers/grilles after they are installed. The implications of this carry a high cost to our very large multifamily projects, which have complex and quick phasing that make timing of testing very narrow/difficult.

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

Our large scale projects often can take up to 5+ years to design and pre-develop, so we are already working on (have started to model, design consult, etc.) projects NOW that will have these 2026 permit dates. This will effectively already impact/change contracted work.

- 5) Do you have any feedback on any other specific components of the proposal?

We generally agree with the approach to consolidate pathways/tracks and have more clear references to ANSI standards as a way of implementing requirements, however further clarifications must be made to those standards, and more consideration must be made to large-scale ASHRAE path projects.



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Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

Yes.

- 2) Do you have any additional feedback on this proposal?

Revision to require lighting to be documented in the MFNC Workbook for the ASHRAE Path is duplicative in conjunction with the compliance form. Preference for just a schedule and total counts (that align with the compliance form) rather than have to show room by room counts in both the MFNC Workbook and the Compliance for.

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

Yes, this keeps the ESMFNC designation stringent and continues to improve our new building stock.

- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

Yes this is fine.

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add Comment]

B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]

C) Should we require the fuel neutral approach be used by all buildings?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

Ok with the fuel neutral approach as an additional option but want to maintain source and cost savings options.

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add Comment]

- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

- 3) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: Building Efficiency Resources (BER) with feedback from the following Rating Companies:

US Ecologic, New Ecology, EcoAchievers, Revireo, Energetics, and Integral Building

Respondent Last Name: Pasillas

Respondent First Name: Gabriel

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

Yes. We believe this makes sense as townhomes are single family dwellings.

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

No. Having townhomes as only SFNH will avoid confusion on which program details/requirements to follow. However, BER's Raters encourage the EPA to use this opportunity to further simplify its definition of townhomes and update it to include all vertically attached townhomes and buildings without common spaces (ie. back to back and stacked). USGBC defines townhomes more simply- vertical dividing walls vs MF with horizontal dividing walls

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

Yes. The MFNC Workbook is all-encompassing and puts everything in one place which will be easier for the Raters and the QADs reviewing these projects.

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

No. The workbook is important to maintain consistency throughout the industry.

- 3) Do you have any additional feedback on this topic?

The workbook needs to be updated to be as clear as possible when explaining what information is required for ERI path projects. An ERI specific tutorial and/or guidance documents will be necessary.]

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

Yes. The removal of exemptions will simplify the program substantially and increase opportunities for participation. There was some concern among raters that, in cold climates, completely eliminating the requirement for slab insulation could lead to cold floors and condensation issues and the EPA could consider a 90% compliance pathway for slabs in cold climates.

- 2) Do you have feedback on any other specific elements of the proposal?

This will increase complication for podiums/above grade slabs. Training and resources should be developed for the total UA calculation. Additionally, the U/R value approach is still valuable to ASHRAE Path and Prescriptive Projects without above grade slabs. The U/R approach significantly reduces the complexity of the take-offs required in large buildings and helps raters more quickly assess compliance. It also needs to be clarified what cross checks will be required from a QA perspective, short of requiring QAD's having to redo the calculations themselves.

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

BER's raters feel that this makes sense to move to in the long term but that the industry is not ready for this jump. They would like to continue to have an option of Track B, or to witness testing.

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?



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BER's raters feel that refrigerant charge testing should still be a minimum requirement and HVAC Contractors still need training to know what is expected of them/ to receive some buy in /commitment from the contractors. Rater comments: "Raters have so much to try to do at final testing, limiting what they do is for the best. Eliminating Track B will add unnecessary soft costs to the project since HVAC contractor already should be doing this testing when starting every HVAC system". There was also concern about testing airflow on VRF systems without readily available static pressure OEM data.

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

No, BER's Raters feel that many of these systems have complex ductwork with long runs that aren't usually tested. There could also be scenarios where more of the system is inaccessible. They feel it will add a lot of time and complexity to their scope. Perhaps providing an option to witness the testing or requiring only ducts outside of conditioned spaces to be tested is an incremental step

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

No, BER's Raters feel that this should be more of an incremental change.

- 5) Do you have any feedback on any other specific components of the proposal?

Further clarification is needed for what constitutes 'final' versus 'rough-in' for duct testing so that definitions align with ANSI/RESNET Standards.



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Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

Yes. Most builders are doing this already as LEDs are widely available. It makes sense to make it a requirement.

- 2) Do you have any additional feedback on this proposal?

No.

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

Yes

- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

Yes

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

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[Add Comment]

B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]

- C) Should we require the fuel neutral approach be used by all buildings?

Yes

- 4) Do you have any additional feedback on this proposal?

BER's raters encourage the EPA to consider creating a more technical training for modelers. Most modelers are really struggling to correctly apply the Simulation Guidelines. BER has also received feedback from multiple raters that they would like an improved compliance path for PHIUS Projects, better site to source conversions and less information required in the workbook.

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add Comment]

- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

- 3) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: Earth Advantage

Respondent Last Name: Stone

Respondent First Name: Peter

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

[Add Comment]

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

[Add Comment]

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

Yes, we agree.

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

[Add Comment]

- 3) Do you have any additional feedback on this topic?

None

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

Yes, and I strongly advocate for this proposed change

- 2) Do you have feedback on any other specific elements of the proposal?

We fully support this proposal to streamline insulation and reduce thermal bridging details, as it will allow more multifamily projects to pursue and achieve Energy Star certification. By enabling flexibility in meeting the 100% thermal backstop requirement and instead focusing on overall u-value performance compliance, we can alleviate a significant burden for developers. Many projects have struggled to meet the stringent requirements for minor areas that contribute less than 5% of the overall thermal insulation for a given component, causing them to abandon certification efforts altogether. Earth Advantage also advocates for this particular change to be allowable for projects under Revision 04 of the program.

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

Disagree

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

Earth Advantage does not support sunseting Track B: HVAC Testing by Functional Testing Agent and transitioning entirely to Track A: HVAC Grading by Rater for multifamily projects. The majority of Raters in the market do not own the specialized equipment required for HVAC grading, which creates unnecessary barriers for project compliance. In our local market, Functional Testing is already a part of code compliance, so this proposed change would not substantially improve outcomes but rather complicate the process. Moreover, many Raters lack the specific training and equipment needed to effectively test the larger HVAC systems often found in multifamily projects. This places an undue burden on Raters, who are already responsible for verifying field conditions and conducting performance testing on various systems. Allowing the option to utilize a trained Functional Testing (FT) agent for larger systems, especially for



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specialized tasks like refrigerant charge testing, ensures better results and minimizes the need for oversight by HCOs/MROs to correct deficiencies in testing and reporting. This type of testing goes beyond the scope of typical Energy Rater training and should be performed by HVAC professionals. While maintaining two tracks may add some complexity to the program, multifamily buildings vary widely in type and size. Preserving the option for an external functional testing agent to perform HVAC grading will continue to provide valuable flexibility and improve overall project outcomes. Therefore, we strongly advocate against the removal of Track B.

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

Yes

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

[Add Comment]

- 5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

Yes, LEDs have pretty much taken over now. LPDs take much time and effort to calculate

- 2) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

[Add Comment]

- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

Because there is not an import tool available for IESVE, a popular and growing modeling software used in the market, the proposal creates more work for teams using this software. Some teams will need to manually input all items again into the EPAs compliance form and companion tool after finalizing the model.

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

- A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add Comment]

- B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]

- C) Should we require the fuel neutral approach be used by all buildings?

[Add Comment]

- D) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add Comment]

- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

- 3) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: Energy Efficient Homes Midwest, Inc.

Respondent Last Name: Jansen

Respondent First Name: Leo

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

We agree with this approach, these types of structures should be in the SFNH program

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

Not that we can think of.

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

If the workbook is required, the reporting data / schema to ES MFNC can still be locked, but there needs to be the ability to unlock other aspects of the workbook to allow for Rating Company / Rating Provider customization that is in use with other companies workflows that is not currently supported or is outside the scope of the current MFNC Workbook design. (i.e. billing, inspection dates, integration with Modeling Software, Company Customization, etc. Basically if ES MFNC is looking for a uniform way to receive this data that is fine, but that should not force one process flow for all Rating Companies / Rating Providers to use and stifle innovation.)

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

Only that the current way that Rating Companies / Rating Providers use their own tools for customized uses would be allowed to continue.

- 3) Do you have any additional feedback on this topic?

[Add Comment]

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

We do agree with this in principle. Additionally, if the QA/QC changes adopted in the new version of the ENERGY STAR Certification System section 6.5 Program Documentation Collection that requires digital capture of this information in the Rater Field Checklist can be leveraged, ES MFNC could calculate an actual ERI score impact of selecting to use these optional pathways in the model, which could help further incentivize their use without negatively impacting compliance with the program if they were not used at all.

- 2) Do you have feedback on any other specific elements of the proposal?

[Add Comment]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

We believe that long term this is a good move, as it will help HVAC installs improve their consistency and long term reliability. However we do anticipate a lot of growing pains between the HVAC industry and Raters as this is rolled out long term.

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

The only downside could be in markets where there is current adopting of Track B with FT Agents that do not yet have any HERS Raters performing Track A, or interested in performing Track A



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

[Add Comment]

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

We do not, mainly based off the way that the HCOs are requiring this process to be rolled out / trained. This requirement should be pushed to 1/1/2027 to allow the market more time to train more Raters in 310. For MF HVAC especially there should be additional training developed for Raters if they are going to fully replace the FT Agent in this process.

- 5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?
[Add Comment]
- 2) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?
[Add Comment]
- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?
[Add Comment]
- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.
 - A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?
[Add Comment]
 - B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?
[Add Comment]
 - C) Should we require the fuel neutral approach be used by all buildings?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?
[Add Comment]
- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?
[Add Comment]
- 3) Is the 10% savings target for common spaces when modeled separately reasonable?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: EnergyLogic

Respondent Last Name: Eagleburger

Respondent First Name: Steve

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

Energylogic agrees with this item and currently certifies most townhomes using the SFNC program.

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

We are not aware of any.

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

We have little experience with the workbook and are concerned it will add significant time to the overall management of a project.

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

Everything in the workbook is already being documented so while it may be convenient to have everything in one document it's ultimately not necessary

- 3) Do you have any additional feedback on this topic?

none

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

In agreement - this will boost participation in the program and can be traded off elsewhere to maintain ERI

- 2) Do you have feedback on any other specific elements of the proposal?

The ability trade off portions of the slab edge insulation will allow much more flexibility for partners to meet the program and avoid potential warranty issues

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

We agree that this is appropriate. Additional training and equipment will needed to achieve this task by rating companies

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

None we are aware of

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

We do have reservations regarding the ability to test large return grill areas successfully using a flow hood.

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

Yes

- 5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

We agree

- 2) Do you have any additional feedback on this proposal?

None

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

We agree

- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

We agree

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

- A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add Comment]

- B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]

- C) Should we require the fuel neutral approach be used by all buildings?

[Add Comment]

- D) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add Comment]

- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

- 3) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: Enterprise Community Partners

Respondent Last Name: Egger

Respondent First Name: Krista

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?
[Add Comment]
- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?
[Add Comment]

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?
Agree
- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?
Potential cost implications for the affordable housing sector in instances where developers retaining consultant services would need to expand their contract to complete this documentation.
- 3) Do you have any additional feedback on this topic?
[Add Comment]

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?
Agree. Enterprise Green Communities provided technical assistance to affordable housing development teams unable to meet the Rev 2 requirements for reduced thermal bridging that would have required continuous insulation for projects in which the scope and budget did not substantiate this level of work, but could otherwise meet ENERGY STAR performance targets. Although ENERGY STAR adjusted the mandatory details for certain project types, the confusion around the original pathway generated concern in the affordable housing sector for maintaining eligibility to ENERGY STAR.
- 2) Do you have feedback on any other specific elements of the proposal?
[Add Comment]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?
[Add Comment]
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
[Add Comment]
- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?
[Add Comment]
- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?
[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?
Agree.
- 2) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?
Agree.
- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?
[Add Comment]
- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.
 - A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?
[Add Comment]
 - B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?
[Add Comment]
 - C) Should we require the fuel neutral approach be used by all buildings?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?
[Add Comment]
- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?
[Add Comment]
- 3) Is the 10% savings target for common spaces when modeled separately reasonable?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Proposal to sunset the Water Management System Builder Requirement

- 1) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?
[Add Comment]
- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?
[Add Comment]
- 3) Do you have any other feedback on this topic?
[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: GDS Associates, Inc

Respondent Last Name: Bennett

Respondent First Name: Bruce

Comments:

Generally speaking I am not opposed to many of the proposed amendments but I do want to urge you to consider the following:

- Many raters (including my team and many others in the Northeast) only use Track B, so confusion between the two tracks and having to explain these tracks is not an issue for those of us that do not use Track A. So we only present Track B.
- Eliminating Track B from the ERI path, mandating the use of another document/file (spreadsheet) adds to an already expensive and complicated scope of work for raters and increases the cost of performing verification services.
- Utility sponsored programs need to include these costs in their total resource cost test for determining program cost effectiveness. These added costs can make it difficult to justify a program or builders' decision to certify homes for the sake of tax credit.
- The level of knowledge and skills required to earn and maintain a HERS rater certification and provider accreditation demands a higher costs to attract the appropriate talent which, in turn results in a higher rating cost to the project. Increasing the scope of work to an already expensive cumbersome process can have long lasting negative impact on the ability of program sponsors to promote implementation.



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: KOW Building Consultants

Respondent Last Name: Fales

Respondent First Name: James

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?
Yes, simplifies the process
- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?
N/A

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?
Yes
- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?
N/A
- 3) Do you have any additional feedback on this topic?

Changes to the MFNC Workbook: Section #3 - I haven't seen any language updates come out to clarify which systems need to be evaluated, there's a lot of double negatives in the description. The way it's currently written a floor-standing unit, wall unit, and cassette would seem to be required to test if they're hooked up to a VRF rather than a mini-split. Section #3/4 - Clarity over the balancing section. It seems like it would make more sense to input the balancing report data rather than the pressures. Many of the values asked for on Section 3 are very difficult to measure / input. I recommend making 3 and 4 an Either/or situation rather than the optional #4 that there's no reason for anyone to ever complete. Section #6 - Clarity on the 'Witnessing' requirement for VRF charging / startup. Will a report and photos be sufficient or do we need to be on site 3 days for each outdoor unit to be witnessed. This is especially difficult as many crews are limited by how many vacuums they have present, often a single vacuum unit can only evacuate 2-3 units in a day.

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?
N/A
- 2) Do you have feedback on any other specific elements of the proposal?
N/A

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?
N/A
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
N/A
- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?
N/A



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

See above answers

5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?
[Add Comment]
- 2) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?
[Add Comment]
- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?
[Add Comment]
- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.
 - A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?
[Add Comment]
 - B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?
[Add Comment]
 - C) Should we require the fuel neutral approach be used by all buildings?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?
[Add Comment]
- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?
[Add Comment]
- 3) Is the 10% savings target for common spaces when modeled separately reasonable?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: MaGrann Associates

Respondent Last Name: Pelosi

Respondent First Name: Kim

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

We do not agree with the proposal to only allow townhomes to be certified through SFNH. EPA indicated in the webinar slide deck that they initially made both options available to accommodate the rare instance where townhouses are attached to a multifamily project, but our experience in the Northeast is this scenario occurs often. For those scenarios, this will create more complexity because projects would then have to comply with different pathways for different portions of the same project. In order to eliminate the additional complexity of allowing townhomes to pursue either pathway, EPA could consider allowing stacked flats to use the SFNH pathway. In that scenario, requiring that townhomes pursue only the SFNH pathway would not be inconsistent with the rest of the project if the remaining portion consists of stacked flats.

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

See above comment

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

While the lack of a standard template may create some additional complexity, we believe requiring the MFNC workbook for all buildings under the ERI path will ultimately create additional administrative work on the rater's end, and as a result more expense on the builder's end. Many companies currently use their own previously developed and preferred tools, and as a result of requiring companies to now also fill out the MFNC workbook, for many this will result in duplicative effort in the likely event that they will still continue to use their own tools. This may also stifle innovation: In developing these tools, rater firms are always looking for ways to increase efficiency in delivering the program, e.g., the use of mobile apps that feed directly into rater created tools, an innovation that will no longer be useful if the MFNC workbook now needs to be manually filled out and cannot connect to a mobile app feature.

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

See above comment

- 3) Do you have any additional feedback on this topic?

[Add Comment]

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

We are concerned that in requiring raters to do all the UA calculations, this will substantially increase the cost to deliver the program. If implemented, EPA should be specific about what calculations will be acceptable from project teams to satisfy this requirement. We would anticipate that most UA calculations outside of aggressive code environments such as DC and NYC will not include, for example, detail related to framing spacing or cladding attachments. As this is updated, EPA should consider the impact of thermal bridging through cladding attachment systems.

- 2) Do you have feedback on any other specific elements of the proposal?

[Add Comment]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

We are ultimately OK with EPA sunseting Track B, but feel that MF projects need a longer transition period (a 2027 rollout would be sufficient). We have many contracts in place with builders that will likely not be permitting by then, and this will require us to update our contract and charge a higher fee. Related to this concern, EPA should be aware that requiring Track A will result in more expensive rater services. EPA should consider that multifamily builders are already paying for a TAB contractor, so much of what will now be required by the rater will be duplicative of what the TAB contractor is already doing. If EPA implements this proposed change, they should at least consider providing a TAB contractor allowance for the air flow tests, and should also consider that certain common area systems, such as outside air ducts directly connected to ceiling cassettes in a 20' high ceiling, are extremely physically challenging and not always feasible to test. An exemption, or standard process on how to address the scenario where a system is not able to be tested would need to be implemented.

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

See above comment.

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

See above comment.

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

As stated above, MF projects need a longer transition period, since these projects have long lead times and many raters already have contracts in place for builders that will not reach permitting before January 2026. We believe a 2027 rollout would be sufficient.

- 5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

Yes, we support this proposed update.

- 2) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

Yes, we support this proposed update.

- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

We do not see any issues with this requirement. We would add that we strongly encourage EPA to better align with the movement toward electrification for new buildings, given their lifespan. Rather than evaluate new buildings solely based on the gross source emissions of today, build in a future looking carbon profile of the rapidly greening electric grid (i.e. using a tool such as Cambium) rather than rewarding the artificially low emissions associated with methane gas.

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add Comment]

B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]



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Comments Received

C) Should we require the fuel neutral approach be used by all buildings?

[Add Comment]

D) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal for the transition to whole-building modeling Path in California

1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

We are not active in California, so do not have any comments.

2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

3) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

4) Do you have any additional feedback on this proposal?

[Add Comment]



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Comments Received

Organization Name: National Association of Home Builders (NAHB)

Respondent Last Name: Manz

Respondent First Name: Amy

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?
[Add Comment]
- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?
[Add Comment]

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?
[Add Comment]
- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?
[Add Comment]
- 3) Do you have any additional feedback on this topic?
[Add Comment]

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?
[Add Comment]
- 2) Do you have feedback on any other specific elements of the proposal?
[Add Comment]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?
It is not, raters have not developed sufficiently for the elimination of Track B.
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
The HVAC industry has significant training and skill that HERS raters do not currently possess. Maintaining Track B allows homebuilders to take advantage of that skillset in the design, installation, and commissioning of homes.
- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?
[Add Comment]
- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?
Task 3 requires expensive equipment and training to complete effectively. With only 5.5% of ratings done in 2023 including HVAC grading, raters need additional time to perform training
- 5) Do you have any feedback on any other specific components of the proposal?
If the Energy Star program is concerned about the quality of system installations maintaining Tack B and re-introducing the requirement for submission of the HVAC Commissioning Checklist to the rater for review is a reasonable compromise compared to the elimination of Track B entirely.



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Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?
[Add Comment]
- 2) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?
[Add Comment]
- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?
[Add Comment]
- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.
 - A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?
[Add Comment]
 - B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?
[Add Comment]
 - C) Should we require the fuel neutral approach be used by all buildings?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?
[Add Comment]
- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?
[Add Comment]
- 3) Is the 10% savings target for common spaces when modeled separately reasonable?
[Add Comment]
- 4) Do you have any additional feedback on this proposal?
[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: Northeast Home Energy Rating System Alliance (NEHERS)

Respondent Last Name: Zeis

Respondent First Name: Cindy

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

No

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

Buildings that have both stacked units and townhouse units, particularly when they have shared MEP, should be able to follow the same MF path for all units.

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

Yes/NO Significant improvements need to be made to the workbook to make it more user friendly. Hopefully, with streamlining of processes the workbook can be improved upon.

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

This may present significant challenges for newer raters/verifiers given the comprehensive nature of the workbook. This may also present additional workload for rating companies who currently use field checklists or proprietary field data collection tools.

- 3) Do you have any additional feedback on this topic?

1- For Phius projects, this creates an additional unnecessary burden to the rater/verifier. Although there is overlap, not all items are duplicated. A project seeking Phius certification would have multiple workbooks to manage given the current program prerequisites. 2 - Recommend that the DOE and EPA consolidate workbooks to decrease documentation burden. It would be beneficial to have a comprehensive workbook incorporating ENERGY STAR, IAP, and ZERH with the ability to select the programs and pathways the rater/verifier will be using. Incorporating QA checkboxes within the workbook would also be beneficial for HCO staff who are performing QA functions.

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

Yes, standards are continually advancing resulting in more reliable capturing of thermal bridging details.

- 2) Do you have feedback on any other specific elements of the proposal?

[Add Comment]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

Rather than eliminating Track B totally, this items should remain in tact, without Contractor Accreditation requirements as an option since fully eliminating this track may have unintended consequences for raters/verifiers and the program. See additional notes for justification below.

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

There are some jurisdictions that require specific licenses/certifications to perform these tasks. This also increases liability to rating companies. How will insurance carriers respond to issues that arise by non-licensed professionals accessing areas of HVAC air handler cabinets and conducting power measurements on live equipment.



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3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

Yes

4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

A ramp-up process should be deployed to allow raters to build proficiency and allow for industry response based on in-field experiences. If moving forward with this adjustment, proposed mandatory compliance date of 1/1/2027.

5) Do you have any feedback on any other specific components of the proposal?

Not at this time.



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

Yes

- 2) Do you have any additional feedback on this proposal?

This simplifies processes for raters/verifiers

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

[Add Comment]

- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

[Add Comment]

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

- A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add Comment]

- B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]

- C) Should we require the fuel neutral approach be used by all buildings?

[Add Comment]

- D) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add Comment]

- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

- 3) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: Steven Winter Associates, Inc.

Respondent Last Name: Klocke

Respondent First Name: Steve

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

[Add Comment]

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

[Add Comment]

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

[Add Comment]

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

[Add Comment]

- 3) Do you have any additional feedback on this topic?

It may be helpful to provide guidance to Raters and MROs highlighting ways to simplify and save time on completing/reviewing the UA calculator in the workbook. Here are some suggestions:

- a. Explicitly allow teams to use dwelling unit insulation as the 'backstop' for common spaces to reduce LOE in MFWB. It could be a Footnote in Rater-D or a "Note" in the MFWB where the drop-down says "Dwelling" or "Common"
- b. Explicitly allow teams to use the WORST case U-factor for a proposed assembly type to avoid documenting multiple rows to capture similar wall types and sub-types
- c. Explicitly allow non-Rater verified "area take-offs" to be provided directly from the Architect (in whatever form they choose to provide) without additional review by Rater.
- d. Explicit statement is needed about documenting the commercial/retail exterior envelope (i.e. it can or cannot be allowed in total UA) Regarding equipment schedules, it would be a good idea to make the "alternatives" in the MFWB to 'provide' AHRI and mech schedules in lieu of completing the tables more visible.

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

[Add Comment]

- 2) Do you have feedback on any other specific elements of the proposal?

[Add Comment]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

[Add Comment]

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

[Add Comment]

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served



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by residential-sized indoor units?

We think the perceived benefit of requiring duct leakage testing on common space systems is not worth the additional level of effort it would require of Contractors, Raters, MROs and QADs to implement. It will slow-down the certification and QA workflows and add additional cost to already high certification fees.

a. Testing common space systems will require a higher level of effort than that required of dwelling unit systems. These systems typically serve multiple spaces that are scattered across the building. The duct runs can be extensive/complicated and the equipment is often located in hard-to-reach areas;

b. Raters will have to calculate leakage targets. MRO's will want to verify the areas and targets are accurate. Unlike dwelling units where ANSI/RESNET defines how to calculate area, there are no guidelines for calculating common space areas which will include multiple unique takeoffs throughout the building.

c. The benefits are negligible. There is no energy impact given these systems are nearly always completely inside the conditioned space volume. The comfort/durability impact is questionable when compared to other considerations like equipment sizing. Also, the alternate duct leakage test is not viable. Testing and balancing (TAB) contractors typically only measure airflow at supply/return grilles; they do not test at air handlers as part of their typical fee. Adding a requirement to perform testing at the air handler will add more cost to the build with marginal improvement in efficiency or comfort over the non-certified building.

4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

[Add Comment]

5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Proposal to streamline mandatory lighting requirements

- 3) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

[Add Comment]

- 4) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 4) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

[Add Comment]

- 5) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

[Add Comment]

- 6) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

E) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add Comment]

F) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]

G) Should we require the fuel neutral approach be used by all buildings?

[Add Comment]

H) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 5) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add Comment]

- 6) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

- 7) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

- 8) Do you have any additional feedback on this proposal?

[Add Comment]



ENERGY STAR Multifamily New Construction Program, Rev. 05

Comments Received

Organization Name: US Ecologic

Respondent Last Name: Gay

Respondent First Name: Paul

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

For simplicity , I agree BUT the definitions need to align with Sister programs (LEED/CODE / ERI/HERS/NGBS)

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

[Add Comment]

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

I agree, its a useful doc to help track items, eg common areas, provides one process for all pathways and we are already implementing this as internal policy

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

[Add Comment]

- 3) Do you have any additional feedback on this topic?

Make it easier to ID and Track Common areas with separate dropdown selection Add QA Checklists to the workbook and prepopulate Data where applicable

Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

Agree

- 2) Do you have feedback on any other specific elements of the proposal?

OK with items needing to be assessed but will have to make sure there be no penalty if the measure is NA eg flat roof and rood deck ins means no need for attic access covers, no platforms in attic etc

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

Do not agree

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

2 Paths Provides flexibility and eliminatin Track B seems too much of an overstep and puts too much burden and liability on Raters/Rating companies

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

[Add Comment]

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

I don't believe so

- 5) Do you have any feedback on any other specific components of the proposal?

[Add Comment]



Rev. 05 of the ENERGY STAR Multifamily New Construction Program Comments Received

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

Agree

- 2) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

Generally Agree it puts a national target v state or local.....aligns with Federal initiatives but maybe a big step for Home rule municipalities who use lesser targets

- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

[Add Comment]

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

A) For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add Comment]

B) For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add Comment]

C) Should we require the fuel neutral approach be used by all buildings?

[Add Comment]

D) Do you have any additional feedback on this proposal?

[Add Comment]

Proposal for the transition to whole-building modeling Path in California

- 9) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add Comment]

- 10) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add Comment]

- 11) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add Comment]

- 12) Do you have any additional feedback on this proposal?

[Add Comment]