

**Comments Received During the Stakeholder Feedback Period for
Revision 14 of the ENERGY STAR Single-Family New Homes Program**



ENERGY STAR Single-Family New Homes Program, Rev. 14 Comments Received

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Comments Received

Organization Name: Addison Homes

Respondent Last Name: Usher

Respondent First Name: Todd

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

It will certainly reduce the complexity of the rating however, I do not believe that many builders will choose to use reduced thermal bridging details when they are not required.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Possibly, but I do not feel that builders often have raters actively participate in the design review unless it's a new builder to the program.

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

As a rater – great reduction in complexity / As a builder – I don't believe many builders will choose to incorporate reduced thermal bridging strategies unless they need to for certification. If these are modeled accurately, then the builders should have to opt for other improved performance practices to achieve the ERI which makes complete sense. I'm for simplifying where possible.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes – makes sense

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

No

- 3) Do you agree that the newly proposed leakage limits are achievable?

[Add Comment]

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

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

Yes – this should be complete at predrywall inspection

- 4) Do you have any other feedback on this topic?

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

- 1) Do you agree that it is appropriate to sunset Track B?

Yes



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

Potentially force some level of education / certification for HVAC contractors – but this is a bigger industry issue that I don't believe was changing as a result of the track B requirements. It was also difficult to enforce.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Most definitely

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

It is difficult for the rater to accurately verify the correct refrigerant charge.

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

What are the allowable methods for verifying blower fan airflow?

Proposal to sunset the Water Management System Builder Requirements

- 1) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?

Yes

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

No

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

Good move – leave it to Indoor AirPlus



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Comments Received

Organization Name: Advanced Energy – HQUITO Team

Respondent Last Name: Coulter

Respondent First Name: Jonathan

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
NA; see HVAC section below
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
[Add Comment]
- 3) Do you have any other feedback on this topic?
[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
NA; see HVAC section below
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]
- 3) Do you agree that the newly proposed leakage limits are achievable?
[Add Comment]
- 4) Do you have any additional general feedback on this topic?
[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
NA; see HVAC section below
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
[Add Comment]
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
[Add Comment]
- 4) Do you have any other feedback on this topic?
[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?
We are cautiously optimistic that the new construction industry is ready to continue to meet/exceed the high standards of the ENERGY STAR program requirement, by:
 - Changing the feedback loops & chain of command from HVAC professionals to Rater professionals
 - Changing the process To Track A only, after slightly more than 10% market adoption [more than 20k homes in Track A out of more than 190k certified homes in 2023 (per "Annual Overview Report – 2023")]



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- Given the limited public evidence from HCO's that only Raters deserve these professional/field responsibilities

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

Potential:

- higher field-verified energy savings per home, with higher likelihood of achieving modeled energy savings through optimized installations

- higher likelihood of non-variable speed HVAC equipment installation alignment with manufacturer recommendations; HVAC installers have more incentive to install correctly due to equipment warranty, comfort complaints, builder reputation, more conversation with manufacturers around training/tech support/new products/incentives, etc.

- confusion and brand erosion from making Tasks 4 & 5 recommended, non-compliance measures now allow for home to remain certified

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes, thank you.

...and if variable-capacity/ cold-climate heat pumps are at cost parity by then, the above comments will likely be addressed by the equipment functionalities.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

Yes, or at least a Rater training/credentialing/enforcement/QA and/or industry pressure on HCOs to plan for Raters to demonstrate effort to be responsible

- 5) Do you have any other feedback on this topic?

ENERGY STAR New Homes Team, thank you for all that you have done to grow this unique and valuable program and help make it what it is today. Will all the partnerships and dependencies on other organizations, we are also striving to create/support irreversible market transformation while also reducing the risk for unintended consequences.

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?

NA; see HVAC section above.

- 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 Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Air Conditioning Contractors of America

Respondent Last Name: Davis

Respondent First Name: Wes

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
[Add Comment]
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
[Add Comment]
- 3) Do you have any other feedback on this topic?
[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
[Add Comment]
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]
- 3) Do you agree that the newly proposed leakage limits are achievable?
[Add Comment]
- 4) Do you have any additional general feedback on this topic?
[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
[Add Comment]
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
[Add Comment]
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
[Add Comment]
- 4) Do you have any other feedback on this topic?
[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?

ACCA strongly supports the robust verification of every HVAC system installed in ENERGY STAR Certified Homes. The data related to the design and measurements from the installed equipment must be objectively collected and evaluated. NOTE: Since this question is about credentialed contractors, Track B will be referred to as credentialed contractors, and Track A as compliance to Standard 310. ACCA is concerned that the intent to move toward Standard 310 compliance, while noble, will miss the mark. We believe the plan will fail to deliver the desired results because it only shifts the responsibility from credentialed contractors to Raters. Currently, ENERGY STAR Certified Homes requires Raters to review elements of HVAC designs for credentialed contractors (National Rater Design Review Checklist, 4.a.2). Yet



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ACCA routinely sees evidence that some Raters are not performing this task. We periodically conduct virtual interactions with contractors to review documentation and policy compliance. Often our review of the HVAC Design Reports finds incomplete forms, obvious efforts to inflate the heat loss/gain, and the selection of oversized equipment. These reviews demonstrate that many Raters lack the ability to meet program requirements. There are Raters who struggle to perform a task with which they have some knowledge, modeling a home's attributes for a projected rating. For this reason, ACCA believes they will struggle all the more with measuring elements related to HVAC system performance. ACCA supports the goal to install HVAC systems that efficiently deliver comfort to ENERGY STAR Certified Homes. However, we believe there is a disconnect between the current program's requirements, their implementation, or their enforcement. We believe it is woefully insufficient to merely mandate a new programmatic requirement that shifts responsibility from one party to another. ACCA recommends that ENERGY STAR conduct an audit of randomly selected HVAC system designs and their compliance with program requirements. ENERGY STAR must consider these findings in their decision to move toward Rater verification of Standard 310. We further recommend that the credentialed contractor requirement be strengthened. We believe a much better course of action would be to require processes that use "smart" tools to communicate measurements, algorithms to assess the data, a database to record the measurements/benchmarks, and the ability to produce an Independent Verification Report when specified requirements are met. A programmatic effort that recognized credentialed HVAC professionals who produced Independent Verification Reports would have great value. To support this transition, ACCA recommends ENERGY STAR set a benchmark for a percentage of homes to achieve Standard 310 compliance (in homes permitted) after 1 January 2027, either by Rater verification or an Independent Verification Report.

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

The oversight provided by an HQUITO for the credentialed contractor has increased compliance to program requirements and eliminated HVAC contractors that failed to meet program requirements.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

ACCA believes that it is vital that ENERGY STAR requires equitably measured and recorded airflow. More importantly, we oppose a process that allows for manual data entry as it lacks the credibility of justly collected measurements. Currently available "smart" tools can collect measurements and algorithms can assess measured airflow. Another tool, recognized by Standard 310 (Flow Grid), also accurately measures air flow, records that measurement, and transmit it to a mobile app. As mentioned, it is also imperative that provisions be made to allow an HVAC professional to collect these and other measurements and submit them as part of the Independent Verification Report as specified in Standard 310. Therefore, ACCA believes the date of the transition is less relevant than mandating a process that objectively collects, geotags, and time/date stamps the measurement. We believe that many Raters will struggle to perform this task, and because of this we also have concerns about the credibility of the data collected.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

The fact that EPA has proposed making important elements of Standard 310 optional "for now" is clear evidence that the proposed workforce is not yet (and may never be) ready to reliably verify Standard 310 compliance. Temporarily watering down Standard 310 requirements is a poor option. Such compromises tend to become permanent and would severely damage the integrity of this program. ACCA staunchly supports the neutral unbiased verification of HVAC system performance. We believe that confirming wattage/CFM and refrigerant charge are consequential to providing verification of HVAC system performance. NIST's study of HVAC faults shows that incorrectly charged heat pumps can use more energy when overcharged (10% ~ 16%) or undercharged (17% ~ 23%). NOTE: The inefficiency ranges depend on the climate and application, at 30% over/undercharge. Each climate and application suffered some degradation to performance when they were over/undercharged. The wattage/CFM requirement, when coupled with duct tightness testing is a good approximation to evaluate duct sizing. A low wattage/CFM indicates less power is necessary for the blower motor to move air through the correctly sized duct system. Low wattage/CFM equates to a more efficient HVAC system. For these reasons, ACCA believes that properly sized duct systems and correctly charged HVAC systems must be mandatory for the evaluation of an HVAC system in an ENERGY STAR Certified Home. EPA should instead ensure that Track B's credentialed contractor pathway remains in place at least until there is sufficient training, adoption of smart tools, and Independent Verification Reports to reliably verify compliance with all five elements of Standard 310 at scale.

- 5) Do you have any other feedback on this topic?

When ENERGY STAR Certified Homes version 3.0 was launched, the Raters were assigned to perform certain tasks related to system evaluation. The majority of Raters demurred, and the program requirements were modified. Based on this, ACCA believes that Raters will continue to balk at the requirement for extra time and special tools to perform these tasks. Further, it is not clear if the data related to Standard 310 compliance will be valid unless it is collected by "smart" tools. The goal to move toward verified system performance will require data integrity, in both the content and its



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completeness. The DOE Smart Tools for Efficient HVAC Performance Campaign provides additional information and further explains the value of wireless smart tools. <https://rescampaigns.pnnl.gov/campaign/step> ACCA strongly recommends that HVAC system performance data be collected by “smart” tools, evaluated, and processed into an Independent Verification Report. An open resource should be created that identifies the Providers, Raters, and HVAC companies involved with any given ENERGY STAR Certified Home. It should be possible to easily identify all parties associated with a certified home.

Proposal to sunset the Water Management System Builder Requirements

- 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 Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Arcxis Builder Services

Respondent Last Name: Cochran

Respondent First Name: Thomas

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

While for the most part we would assume performance to be the same considering there are still testing backstops we do believe that this will lead to additional comfort issues and increase warranty and customer service claims.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Builders who are already using best practices are not likely to back out their details, but new builders to the program may never implement best practices if they come with significant cost and there are performance alternatives.

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

[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

While for the most part we would assume performance to be the same considering there are still testing backstops we do believe that this will lead to additional comfort issues and increase warranty and customer service claims.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

We'd recommend development of a post drywall thermal scan to verify thermal bridging, air sealing, and insulation installation as an alternative for builders who have shown a history of following best practices and installing grade I insulation.

- 3) Do you agree that the newly proposed leakage limits are achievable?

Generally speaking the majority of homes meet the limit today based on code and builder quality standards. Based on the streamlining of the above sections it's logical to improve the performance requirements to ensure a tight envelope. We would request that for climate zone 2 and for homes with installed fire sprinkler systems that the ACH allowance be moved to 5ACH rather than 4ACH.

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

[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

We do believe that it's appropriate to classify each item. In addition, very specific details on partial verification should be provided as that likely impacts both the rater and builder processes and will take additional coordination.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

We agree

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

We agree with the verification piece of this however it's important to note that local building officials and local code inspections pay particular attention to this item and may not allow for sealing, especially in the SW United States. An exemption due to code override is critical here.

- 4) Do you have other feedback on this topic?



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Comments Received

[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?

Yes we agree as it eliminates potential conflicts of interest, though it may take time for the industry to adjust where the costs are incurred to return to cost neutrality.

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

[Add Comment]

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

We do not believe these should be required. These are best left as optional given the additional variables of performing various testing methods. The incentive to improve HERS scores exists without the 5 steps being a part of this program.

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

[Add Comment]

Proposal to sunset the Water Management System Builder Requirements

- 1) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?

Yes we do.

- 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 additional feedback on this proposal?

[Add Comment]



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: BALDERSTON ASSOCIATES LLC

Respondent Last Name: BALDERSTON

Respondent First Name: TOM

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

YES IT ADDS FLEXIBILITY FOR THE BUILDER TO USE THE MOST COST EFFECTIVE DETAILS

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

PROBABLY NOT AS MUCH, DEPENDS ON THE RATER AND IF THEY HAVE TO CHANGE ANYTHING TO MAKE MODELING TARGETS

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

[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

Yes

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes

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

GOOD CHANGES. BACKSTOP AT 4.0 ACH50 IS ALREADY BEING ACHIEVED IN A LOT OF HOMES IN WA

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

YES

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

YES – MOST OF THE TIME WE VERIFY ALL OF THEM ANYWAY

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

YES

- 4) Do you have any other feedback on this topic?

[Add Comment]



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Comments Received

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

- 1) Do you agree that it is appropriate to sunset Track B?

NO, IT SHOULD STILL BE AN OPTION - FULLY CERTIFIED HVAC CONTRACTORS KNOW MORE ABOUT THEIR SYSTEMS THAN RATERS. RATERS ARE NOT FULLY QUALIFIED TO UNDERSTAND THE WORK AS WELL AS GOOD INSTALLERS.

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

FLEXIBILITY – MAINTAINING A CHANNEL FOR BOTTOM UP KNOWLEDGE TO REACH THE PROGRAM. IT IS VERY IMPORTANT THAT THESE PROGRAMS NOT SURVIVE ONLY ON TOP DOWN KNOWLEDGE. IN TRACK B YOU ARE PUTTING A RELATIVELY INEXPERIENCED RATER IN CHARGE OF INSTALL - IT CAN WORK IF THEY WORK WITH THE INSTALLERS AND OVER TIME WILL LEARN MORE, BUT SHOULD NOT BE THE ONLY OPTION.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

[Add Comment]

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

NO - THESE PROGRAMS ARE BECOMING SO COMPLEX.. NO ONE WILL WANT TO DO THEM IF THIS KEEPS GOING

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

[Add Comment]

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?

NOT REALLY - H2O MANAGEMENT IS A CRITICAL PIECE. WHILE MOST BUILDERS IN THE PNW ARE PRETTY ADVANCED ON THIS, THERE ARE STILL PLENTY OF SMALLER ONES THAT DON'T KNOW WHAT THEY ARE DOING.

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

HOMES THAT DON'T ROT FOR THE BUYER

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

[Add Comment]



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Building Efficiency Resources (BER)

Respondent Last Name: Pasillas

Respondent First Name: Gabriel

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

No. While we agree that the removal of exemptions will make it more accessible for builders to determine compliance, eliminating slab edge insulation as a requirement would be detrimental to the home's performance overall.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

No, people ignore optional measures.

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

These changes adjust the program to be more flexible for builders and encourages them to participate with the program.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes. Streamlining is always preferred, and the infiltration backstop will ensure that homes are properly air sealed.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

No.

- 3) Do you agree that the newly proposed leakage limits are achievable?

We agree with the proposed limits due to many existing codes and programs already requiring stricter leakage limits. Most ENERGY STAR certified homes are meeting this requirement already. For DETACHED dwelling units we do not agree with including them in the alternative air leakage of 0.30 CFM50/sqft and believe they should be held to the proposed ACH50 leakage limits.

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

This would require knowledge from raters during inspection to be sure homes are properly air sealed and will pass the blower door test.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes. This will eliminate any confusion on the builder's end.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes. Most items should be rater verified to ensure that quality assurance is met and the builder is not reviewing their own work.

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

Yes. If not currently, raters need to work with builders to ensure these items can be field verified.

- 4) Do you have any other feedback on this topic?

The program needs to require evidence of completion of these items by the builder via photo documentation presented to the rater.

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

- 1) Do you agree that it is appropriate to sunset Track B?



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No. Without proper measurement/testing of the Watt Draw & Refrigerant Charge, performance and efficiency of the installed system cannot be accurately calculated.

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

Track B raised the level of accountability for the HVAC industry; However, it can be difficult to get in contact with these companies and get the proper documentation. It also led to decreased accountability when the HVAC installer can test and review their own work without the presence of a third party.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes, as long as the changes are approved and the clients are notified at least 1 year in advance to make appropriate adjustments to their internal processes and notify industry professionals.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

Yes, Tasks 1 through 3 alone are insufficient to ensure proper installation of the systems. Tasks 4 and 5 are typically performed by the installer to reduce callbacks, but they also are tasks essential to the actual performance of the system installed.

- 5) Do you have any other feedback on this topic?

If the EPA is determined to eliminate Track B, tolerances for system airflow become excessively wide and easy to reach compliance (i.e. up to 25% deviation in airflow, which would be the far limits of what is considered Grade II airflow from the HVAC Grading standard). We recommend Energy Star require Grade I airflow (15% or less deviation) in an Energy Star system.

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?

No, while many of these items are already required by local codes there still must be some documented accountability for these requirements. We would even recommend at least some sort of submitted checklist for these requirements to be verified.

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

These things are essential to do for the longevity of new homes and should be a requirement by ENERGY STAR.

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

No.



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Building Performance Consultants, Inc.

Respondent Last Name: Gary

Respondent First Name: Jeremy

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

Yes. This requirement was a particular challenge for those of in high wind areas that have structural considerations. I think that accepts of this all well baked into the program form top to bottom at this point

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

I am honestly unsure. I think time will tell for this topic.

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

I would like to see this implemented as outlined in the draft proposal

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Simplification and streamlining is overdue for ES. It will be greatly welcomed. The number of footnotes in recent years has become unwieldy.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

Not as this time

- 3) Do you agree that the newly proposed leakage limits are achievable?

Very much so

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

I would like to see this implemented as outlined in the draft proposal

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Absolutely agree with adding these point-by-point clarifications. Long overdue, in my opinion.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

I think that 5 is a very reasonable number to allot to the builder and still maintain the standards of the program

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

I have no objection to this

- 4) Do you have any other feedback on this topic?

I would like to see this implemented as outlined in the draft proposal

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

- 1) Do you agree that it is appropriate to sunset Track B?

It can be difficult and expensive to find an HVAC contractor with ES credentials. Raters are really in a key position to perform these tasks. I often found Track B lacking in accountability on the HVAC contractor.

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

I haven't used Track B in several years. There are only a few ES HVAC contractors even left in my area, and they are



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too busy to deal with the program.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Abolsultely it is enough time to prepare. The learning curve for completing airflow testing is relatively low and equipment inexpesinve.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

I agree with these tasks being optional and adding a performance-based incentive to those wanting to persue them

- 5) Do you have any other feedback on this topic?

I would like to see this implemented as outlined in the draft proposal

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?

Many builders are already implemtening these measures as a matter of due course in operating their businesses. They understand the need to address bulk water manegemant without this additional checklist requirement.

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

No

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

I would like to see this implemented as outlined in the draft proposal



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Building Science Institute, Ltd. Co.

Respondent Last Name: Dillon

Respondent First Name: Brett

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

It seems most individuals on the verification side have not read or been appropriately trained on ANSI 301 Appendix A and B, so the impact could be negligible. That isn't because they're already doing the work - rather, because they don't know what's expected of them.

Some items, such as slab edge insulation, are sensible to remove as a mandatory requirement. In many areas, termites cause issues to such a degree the exceptions are practically the norm. But others - such as verification of advanced framing details, or use of continuous insulated sheathing, should remain.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Are these details even broadly available to be seen on plans now? How much additional work will go into updating old plans to add these details so software analysts and verifiers can see them at the design stage?

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

If you drop these mandatory requirements and rely on raters who are under pressure from their clients, the builders, to squeeze every point they can, this will likely lead to unintended consequences.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

We agree that these specific revisions are sensible: attic access panels and recessed lighting, common wall between townhome and duplex units, and the stucco-related air sealing exemptions is sensible.

A mandatory air leakage backstop is fantastic and long overdue. We've had complaints from third-party green building programs regarding the lack of an ACH threshold for ENERGY STAR®. However, we believe ENERGY STAR® should have more stringent ACH thresholds than the energy code, where feasible. In climate zones 0, 1, and 2, the threshold should be 4 ACH50. In climate zones 3 and up, they should be 3 ACH50, and reassessed at the next version update. The alternative for dwelling units less than or equal to 1,500 ft² is acceptable, with the goal to reduce it to 0.28 CFM / sq. ft. of dwelling unit enclosure area at the next version update.

To remove the top plate / blocking requirement does not make sense. Most raters in the field have not read or properly understand the requirements in ANSI 301 Appendix A or B. In our discussions with participants across HCOs, most look just at the insulation itself for quality purposes, because that's how they have been trained. And while it is a requirement to achieve Grade 1 or 2 installation (depending on insulation type), if a rater spots that as a "must correct", without explicit program language that requires it, our experience has been builders will ignore it. Raters will either "correct and proceed" or lose future business with that builder if they require those details.

To eliminate the gasket beneath sill plate on top of concrete requirement removes a critical piece in the resilience of a home. Moisture will move from concrete into the wood, which reduces the integrity of the construction. This is a low-cost, easy thing to do. This has been a long-time program requirement, and if builders have not been doing this, they shouldn't receive ENERGY STAR certifications on those homes.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

N/A

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes, though they should be more stringent in the lower climate zones (2021 IECC CZ 0-2).

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

The program should keep focus on the end-user, the homeowner or dwelling unit occupant. Are these revisions going



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to provide that family with a healthy, resilient home? Or will these provide an “out” for participants to avoid building a truly above-code dwelling unit that is comfortable, durable, energy efficient and better for the environment?

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Absolutely

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

Yes - if raters perform the mandatory minimum two inspections, they have the opportunity to verify the majority of the requirements.

- 4) Do you have any other feedback on this topic?

ENERGY STAR® should consider requiring a third inspection, one focused on the air-sealing details that may not be visible during an inspection of the insulation. This would eliminate any excuse that a detail was not visible or accessible, and would give occupants of ENERGY STAR-certified dwelling units more resilient homes in the face of climate change-induced weather shifts.

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

- 1) Do you agree that it is appropriate to sunset Track B?

We do not agree it is appropriate to sunset Track B (credentialed contractor). This path gives business opportunities to HVAC contractors to distinguish themselves in the market, and it provides more oversight on participants through H-QUITOs (ACCA and Advanced Energy). Instead, the ENERGY STAR program should mandate the use of automated software tools such as measureQuick or equivalents to provide an ACCA QI 5 commissioning report from a credentialed contractor.

This would provide more accurate data than the current checklist-only Track B, and provide dwelling unit occupants with the peace of mind that their system(s) were appropriately installed and commissioned.

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

The distinguished ENERGY STAR mark is a powerful marketing tool for builders and HVAC contractors. This should not be understated. Further, a shift away from the credentialed contractor track to strictly third-party rater verification, removes the benefit of direct oversight on credentialed contractors. Where is the stick for HVAC contractors who fail to correctly perform their required tasks?

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes, though arguably the full HVAC Design review is *also* new for most Raters. Our cross-HCO-experience leads us to believe that Raters are not used to performing Manual J reviews, let alone Manual S or D. Many Raters simply take the documents at face value, without a dive into the required review elements.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

Yes. If we want to provide peace of mind to a homebuyer that their home has been appropriately commissioned and will keep them safe & comfortable, we must get the watt draw and refrigerant charge. Without that data, we miss out on verification of the initial operational status of a system. Refrigerant charge is an incredibly important element to properly working systems.

- 5) Do you have any other feedback on this topic?

We have many concerns on the national level that sunseting Track B will open the door to unqualified, inexperienced Raters “grading” a complex system without appropriate oversight or training. We cannot forget that Raters are inherently biased - in the vast majority of new construction, they are paid by the builder. We've personally been on site when builders have threatened Raters with losing business if they did not make the “correct” call. We've seen evidence of systemic fraud become publicly available where Raters allegedly failed to perform the required inspections. We cannot ignore the potential for Raters to inappropriately grade an HVAC system with Grade 1 values that did not actually meet the thresholds - due to



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pressure from clients, management, or others.

Even with ENERGY STAR now requiring direct HCO oversight, much of the national home energy rating industry has centralized into the hands of a few companies. These companies are typically vertically integrated, with delegated oversight and training authority. Even if the individual Rater in the field performs their tasks successfully, there's nothing truly holding back an internal bad apple from modifying data to provide the most favorable outcome for their client.

On the quality assurance side, individuals could reuse a library of previously-taken photos to hide their tracks. Their internal, delegated QA may be none the wiser, and the potential for these projects to be discovered is limited by HCOs without a centralized data collection and modeling tool.

On the training side, Raters may have been taught to perform tasks that put themselves in harm's way. They could put themselves at risk of electrocution by completing a 310 assessment by performing the watt draw measurement at the panel box. They could attempt an invasive refrigerant charge check when unqualified to do so and illegally release refrigerant into the environment. Additionally, there's no current requirement for training to review HVAC design documents, which is a distinct task from being able to read plans and specifications.

Even the current ANSI 310 training requirement from the most prevalent national HCO (Section 206.2.4) is comprised of four ~1 hour presentations and a field assessment under the eyes of a QAD that also attended those same presentations. There are **no additional requirements** in the largest national HCO to train how to review HVAC design documents though some providers, to their credit, do this. How can we have confidence that Raters even *know* what they're looking at, let alone understand it?

We have other concerns unrelated to the workforce - mainly that the cost of the ANSI 310 services are artificially low in many areas, which pressures otherwise ethical third-party inspectors to inappropriately grade HVAC systems to remain competitive in pricing with national companies who offer lower prices due to the large volume of work they have.

All of these issues do not engender confidence that sunseting Track B to rely solely on third-party raters will provide the outcomes most beneficial to the homebuyers of ENERGY STAR-certified dwelling units. We **must** keep the homebuyers and occupants at the heart of the conversation.

In Quality Management, you will discover system problems and people problems. You cannot solve system problems with a focus on people and you cannot solve people problems with a focus on systems. The current system doesn't seem to be the issue- it seems to be the people in the system.

In proper Quality Management, the person who does the work must be accountable and responsible for the job. They must have the means to carry out the job. They must know what they are supposed to do. They must know whether they are doing what they're supposed to do. They must be able to change what they are doing if it does not conform with what they are supposed to do. If ANY of these requirements are NOT met, this is a strategic problem that is management's responsibility to correct. If ALL these essential requirements are met, errors are the responsibility of the person who does the work.

In the case of HVAC grading, many of the installing contractors have not held accountable and responsible for the job. Many have not been trained in what they are supposed to do. Many of the raters have not been trained in what they are supposed to do. There doesn't seem to be a good feedback loop to let either of them know when they aren't doing what they are supposed to do. Many raters we've spoken with feel helpless to change what they are doing because of pricing and management pressure.

The whole point of Quality Management is to make quality improvements to the current system. How does reducing accountability, responsibility, and oversight for HVAC installations improve the quality of HVAC installations and yield a quantitatively better homeowner or occupant experience?

Just because it is difficult doesn't mean it shouldn't be done.



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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?

Since these have been rarely reviewed by Raters once the checklist was shifted to “mandatory requirements”, this change aligns with the reality of the industry at this point.

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

Other than having clear, obvious requirements for builders to comply with, no.

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

N/A



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Comments Received

Organization Name: Builder Services Network

Respondent Last Name: Wenman

Respondent First Name: Richard

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
Yes fair to say
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
If they fit the need of the building style absolutely.(post and beam metrics still not incorporated though)
- 3) Do you have any other feedback on this topic?
Adding additional advanced framing metrics to account for other typed of building other than standard 2*4 or 2*6 construction. With Shawood Homes(Seiksui House) They use a 1.12" * 4.72" stud cavity. And are using Post and Beam Construction. It does not seem like the current checklists take them into account.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
Yes
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
No
- 3) Do you agree that the newly proposed leakage limits are achievable?
Yes
- 4) Do you have any additional general feedback on this topic?
Nope

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
I don't like the builder verifications I feel its misused
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
Yes
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
Yes
- 4) Do you have any other feedback on this topic?
No

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

- 1) Do you agree that it is appropriate to sunset Track B?
Yes
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
No



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- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?
Yes
- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?
Yes
- 5) Do you have any other feedback on this topic?
No

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?
Yes they don't do it
- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?
no
- 3) Do you have any other feedback on this topic?
no



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Comments Received

Organization Name: BUILDTank inc

Respondent Last Name: Schwarz

Respondent First Name: Robby

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

No not entirely. I think this should be relooked at in relationship to requirements in the 2021 IECC that also address thermal bridging. For example, I think it is a mistake to eliminate the slab edge detail requirement as it is one of many that are not installed consistently through code but should through EnergyStar certification. Another example would be insulated corners and headers. I think bolstering this requirement would be very helpful. To better ensure that the engineer is brought into the discussion early on in design to ensure structural integrity as well as efficiency. Another aspect of thermal bridging is condensation control so requiring some level of exterior insulation is lost rather than enhanced by this proposal.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Possibly, but we know that Raters are generally looking at this after the design has been completed. Their needs to be a way to encourage their participation in the design discussion. If insulated headers, slab edge insulation, etc. move from an option to a requirement in addition to this design review checklist I think you would see change in the industry.

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

When things are not required they will not be done. Recommendations don't work in the real world. I would consider this a role back. I think you can streamline and make it easier with less interpretation in other ways to continue the great work that EnergyStar has been doing to promote better construction and more efficiency.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes if the edits are in alignment with the 2021/2024 IECC Table R402.4.1.1. I like the idea of having a national EnergyStar ACH50 target. I would suggest that all EnergyStar home should not be leakier than 2.0 ACH50 or better yet use a CFM per 100 sqft of building enclosure area this must be tighter than 0.30 CFM50.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

I would suggest that items addressing top plates connection to ventilated attics and sill plate/rim joist connections continue to be addressed from an air sealing perspective. Seal the drywall to the top plate of all topplates adjacent to unconditioned space. Seal the rimboard to the subfloor, rimboard to the sill plate or top plate, and seal the sill plate to the foundation. The gasket is not the issue as it is a capillary break, sealing is the issue and now that we have tapes and liquid flashing available it is easy to address.

- 3) Do you agree that the newly proposed leakage limits are achievable?

I don't like back stops I would make an air leakage rate a requirement. This is one of the biggest downsides to EnergyStar that you can leak more than code allows prescriptively.

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

I think you should require a test of the separation between the house and the garage for efficiency and heal and safety

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

I think builders should not be allowed to self verify at all. Instead EnergyStar needs to work with RESNET to create better and more definition about remote inspection and inspection of items that are not 100% visible. I think this will be dependent on if you are working with a production builder or a custom builder and how many homes have been certified because there is a relationship and knowledge of how things are done or not done that can and will impact the quality of the data that is gotten from a picture or from an assumption made because 100% of an assembly is not visible.



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2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

No

3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

Agree!

4) Do you have any other feedback on this topic?

[Add Comment]

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

1) Do you agree that it is appropriate to sunset Track B?

YES Agree

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

No

3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes

4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

I think that we will continue to learn how to perform Tasks 4 & 5 better as we do it more. I think that Standard 310 needs to continue to change and work on helping make Tasks 4 & 5 more accomplishable and repeatable than they currently are.

5) Do you have any other feedback on this topic?

[Add Comment]



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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?

NO – I think the rater should be required to verify this checklist rather than leaving it up to the builder.

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

An EnergyStar house provides significant better quality than a non EnergyStar home. You can no longer say better is better because we still see too many builders not carry out the water management requirements on the current checklist. If Raters took this checklist on it is not only a market opportunity it also improves the quality of an EnergyStar home.

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

instead of leaving this to Indoor AirPlus I think you should make the two programs one which would significantly differentiate EnergyStar from Code.



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Comments Received

Organization Name: Deltec Homes, Inc

Respondent Last Name: Dickens

Respondent First Name: Leigha

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

Mostly

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

No, I doubt it. If not required to do it, many won't. Or might try but won't be able to enforce with subs who don't care, and then they lose that tool. The ERI will require *something* to be done, so I agree with the general direction to let the ERI sort it out because that offers more flexibility. But no, I don't think adding this to the checklist is going to really do anything.

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

In general I support this, and overall program participation will increase slightly because of this, because those builders that could not manage one key detail in 100% of the area, for example slab edge insulation, exterior insulation, or advanced framing, but still otherwise have efficient enough homes to meet the target ERI, will now be able to continue with certification. This will also make certification easier for owner-builders who are more likely to make mistakes in some small areas that might have cost certification with the past checklist, for example, ledgering decks onto a slab edge before insulating the edge without realizing they missed that and then not wanting to totally rip off their decks to fix it, so they forgo certification instead (that happened on a project I was involved in.) I am somewhat more hesitant in supporting the change to make item 3.4 on the rater field checklist no longer mandatory, because that offered an array of options rather than one single absolutely pass/fail thing, and I do think that without having to pick one off of that menu, a large # of builders will pick none and make up their ERI in other ways. Thus if reducing thermal bridging on it's own is important, this change will be less effective at that. But I would be curious to see what those other ways are, and I do generally agree that simplification will improve participation and clarity, and making things less "hills to die on" so long as they are accounted for in the ERI is in general a movement I support.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

I am neutral. I think our own homes will get slightly less air tight because the checklist was a useful tool for managing subcontractors, site supers, etc. But, our homes were already considerably tighter than your new backstops anyway.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

No

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes, easily so. They could be sticter and still be very achievable but it is fine to leave that to other programs.

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

The air sealing section of the rater field checklist was a useful third party resource document to use to manage subcontractors, and I often used it as an educational tool for owner-builders. It is not written in language that is very clear to non-energy nerds through, so it had limited usefulness in that fuction, but still, I do lament the loss of that tool. Could EPA create an example checklist, using more consumer-friendly language to describe items, as a best practice, as a program handout? This item coming from Energy Star and having third party cred is useul as an education tool.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?



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Yes, we rarely builder verified things anyway.

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

I have not Rated Energy Star homes and have not built projects that have this kind of separation, so I'm not sure.

- 4) Do you have any other feedback on this topic?

No.

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

- 1) Do you agree that it is appropriate to sunset Track B?

Not entirely.

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

I have seen Track B used in systems with mini splits, even ducted or combination ducted/ductless systems, or air-to-water radiant heating + fan coil cooling systems, to exempt these projects from a fair amount of paperwork (sections 3 thru 5 of the rater design review report) and testing (because commissioning checklist is optional for these systems and they aren't using track A) and also from having to use a credentialed contractor (because footnote 14 of the rater design review checklist explicitly says that apt is NA for these type of experimental systems.) Whether that is good or bad I don't know, or the intent of Energy Star for homes with those types of systems, but the practical result has been it that jobs that in reality would not have gotten certified because they couldn't find a credentialed contractor or a Rater who could do HVAC grading, which has been a common experience of my homewoners all over the country, were thus able to be certified, which I think has been a good thing. But it has also meant that there was not enforcement on hvac design or sizing of these types of systems (because items 3 thru 5 on the HVAC deign report, per the policy record, don't have to be filled out for these system types.) Mini splits are regularly oversized for cooling by more than the limits outlined in both track A and track b, because they are used for their hyperheat backup and are sized for the heating load. I am not as familiar with standard 310 or track A yet because our local Raters have not used it, so I'm not clear on if that exemption from having to even have the manual j reviewed and the oversizing limits enforced has its equivanet A—but if it doesn't, losing that would be a huge mistake and cost Energy Star a lot of certifications with these system types, at least at first, because mini-splits regularly don't meet those cooling oversizing limits and are by design aren't supposed to if designed for heating with no backup. Clarification will be needed. This exemption exists in the policy record even for the case of ducted mini splits or combination ducted/ductless mini split systems, which are common in designs I work with, and maitaning what to do about those systems will still be important.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

I am not a Rater, so I am unsure, but I suspect not. The Raters I regularly work with don't seem prepared to do those tests, but they've never had to be prepared by a set timeline before, so I am unsure how much warning time they would say they need.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

No, at least, not by 1/1/2026. I do not sense that Rater infrastructure exists to be able to do those tasks, when I inquire with Raters about being abel to do the HVAC grading track they regularly are unsure about it.

- 5) Do you have any other feedback on this topic?

The entire HVAC requirements of Energy Star were too complicated, too unrealistic (HVAC credentialing), and extremely confusing. As described above, a common way I have seen mini-split jobs certified is through a convoluted chain of footnotes and policy record references that end up exempting them from a lot of this paperwork. In that sense, sunseting track B does make sense because having to dig through policy records and footnotes to understand what to do is not something the average builder or HVAC contractor has time for (only people like me punish ourselvse that way), but I don't think that cleanup is quite enough. Should additionally clarify the itent for mini splits: do they stil get exempted from the same things they used to with track B? What about geothermal, or new types like air to water radiant systems?



ENERGY STAR Single-Family New Homes Program, Rev. 14

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?

Absolutely. The document existing but with the very vague language on whether it had to be enforced just made this program unecessarily confusing and complex.

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

Nobody was looking at it anyway.

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

No



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Energy Efficiency NOW

Respondent Last Name: Maxwell

Respondent First Name: Jon

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
Absolutely not. Builders will abandon Advanced Framing for their old way of doing things and stick more and more wood in walls, in place of insulation. This would be a giant step backward. The current requirement is no hassle at all dealing with exemptions.
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
No.
- 3) Do you have any other feedback on this topic?
[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
Yes.
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]
- 3) Do you agree that the newly proposed leakage limits are achievable?
[Add Comment]
- 4) Do you have any additional general feedback on this topic?
[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
Yes
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
Yes
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
Yes
- 4) Do you have any other feedback on this topic?
[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?
No
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
Yes. HVAC contractors have far more knowledge, and equipment, to measure such things as refrigerant charge. Please leave both tracks.



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?
[Add Comment]
- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?
[Add Comment]
- 5) Do you have any other feedback on this topic?
[Add Comment]

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?
Yes
- 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?



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Energy Efficient Homes Midwest, Inc.

Respondent Last Name: Jansen

Respondent First Name: Leo

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

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 SFNH 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) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

We think this item is a fine addition and see no issue with it.

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

Just to re-enforce our suggestion on the first question, it would be great if ES SFNH could capture as much of this information as they can programmatically in the Modeling software, and continuously revisit this decision based off actual modeling impact or program adoption/success rates.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

We concur with this approach!

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

[Add Comment]

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes these should be available based off the number of homes currently achieving this standard.

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

[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes we feel that adds clarity to this process and should help minimize questions on how to apply this process.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes this helps establish some continuity in the verification process.

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

This can be very difficult to do in all cases by the time a Rater is called out for a Rough Inspection, and might require a third site visit to visually verify. We think this should stay as a Builder Verified option.

- 4) Do you have any other feedback on this topic?

[Add Comment]

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



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

- 1) Do you agree that it is appropriate to sunset Track B?

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 HVAC Credentialed Contractors that do not yet have any HERS Raters performing Track A, or interested in performing Track A.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

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.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

No, for the below reasons: For Step 4, the watt draw process is complex to get correct every time in a repeatable fashion across all system types, and most Raters or RFIs are not fully trained in how to do this correctly/safely. It is only a matter of time before a Rater is seriously injured or killed by performing this step incorrectly. Furthermore, if the Rating Company is doing their due diligence, they will find that they might be performing services beyond the scope of their current workmans comp insurance scope (if they are coded like most are as Construction – General). I have had Raters in my Proviership dropped from their current carrier as they were performing work tasks that should be categorized as an HVAC Technician, which normally carries about a 10% rate for workman's comp. For Step 5, the process for ascertaining this value in a non-invasive way is too tied to outdoor ambient conditions for it to be 100% uniformly applied across the country. Making it optional is a good way to allow the practice in markets where the climate zone allows for it, but not penalize the Raters who cannot based off their location.

- 5) Do you have any other feedback on this topic?

[Add Comment]



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Proposal to sunset the Water Management System Builder Requirement

- 4) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?

As long as the impacted items that are also in the IAP program are covered there, then we are fine with this.

- 5) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

The only impact we could see is that this could impact the IAP program requirements that build on these items, and if this is sunsetted then the IAP program needs to adjust as needed to make sure they are still checked.

- 6) Do you have any other feedback on this topic?

[Add Comment]



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: EnergyLogic

Respondent Last Name: Eagleburger

Respondent First Name: Steve

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
In agreement - this will boost participation in the program and can be traded off elsewhere to maintain ERI
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
Yes, it's clear.
- 3) Do you have any other feedback on this topic?
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 streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
In agreement- The IECC has required these air sealing details in the last 3 or 4 editions. Inspecting them again for Energy Star is redundant.
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
This entire list could be reduced to one item- Home meets Table R402.4.1.1 2021 IECC air sealing requirements.
- 3) Do you agree that the newly proposed leakage limits are achievable?
We see no impediments to achieving the air sealing limits. The IECC requirements are more stringent in most cases.
- 4) Do you have any additional general feedback on this topic?
Proposed exception for Item 4.1.9- Fire code jurisdictional rulings often conflict with air sealing materials in the common walls. We propose an exception for units that use a whole house air sealing product such as AeroBarrier to achieve the targeted ACH.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
We don't disagree but the 10% will be a challenge to calculate correctly during an inspection. How will the 10% limit be enforced?
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
Items 4.1..2, 4.1.7 should be allowed to be builder verified. Gaskets go missing or may not be installed at the time of inspection due to painting operations.
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
In agreement- RFI/Raters can inspect this item pre-drywall. Energylogic verifies this detail currently but often it is contradicted by the the jurisdictional fire code.. We propose an exception for units that use a whole house air sealing product such as AeroBarrier to achieve the targeted ACH.
- 4) Do you have any other feedback on this topic?
None

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



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

- 1) Do you agree that it is appropriate to sunset Track B?

EnergyLogic agrees that this is appropriate and could increase participation in the program. However, there will be a substantial upfront cost to rating companies in terms of equipment acquisition and training. There will be an increased cost of services to the builder as well.

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

There may be an increase in reinspections and delayed certification

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

It does allow sufficient time.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

EnergyLogic does not agree that Tasks 4 and 5 in Std 310 be mandatory for compliance. We see the difficulty in performing watt draw testing on heat pump equipment due to the inability to reliably set the units on high speed. Refrigerant testing is using the non-invasive method is not possible several months out of the year in our climate zone, which would force us to rely on information collected from the HVAC installer to complete the weigh in calculations. This is an unreliable path to compliance.

- 5) Do you have any other feedback on this topic?

The EPA should consider encouraging the use of refrigerants with lower Global Warming Potential by allowing a reduction in the ERI for certain types with lower GWP.

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?

EnergyLogic agrees with this item. We do not collect the water management checklist currently and most items on the checklist are required by code.

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

No comment

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

No comment



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: ES Green & Company, LLC

Respondent Last Name: Conn

Respondent First Name: Jane

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
Yes
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
No
- 3) Do you have any other feedback on this topic?
I have found most builders will do what is required,

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
No
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
No
- 3) Do you agree that the newly proposed leakage limits are achievable?
Yes
- 4) Do you have any additional general feedback on this topic?
No

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
Yes
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
Yes
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
Yes
- 4) Do you have any other feedback on this topic?
No

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

- 1) Do you agree that it is appropriate to sunset Track B?
No
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
unsure
- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Yes

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?
No—raters are not HVAC contractors, nor are we electricians.
- 5) Do you have any other feedback on this topic?
I get your concern about the HVAC system. And your frustration about no quality control over the HVAC contractors. But—
This penalizes the raters and the builders. That is, to me, most inappropriate.

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?
Yes
- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?
unsure
- 3) Do you have any other feedback on this topic?
No



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: ES Green & Company, LLC

Respondent Last Name: Christesen

Respondent First Name: Julie

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
[Add Comment]
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
[Add Comment]
- 3) Do you have any other feedback on this topic?
[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
[Add Comment]
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]
- 3) Do you agree that the newly proposed leakage limits are achievable?
[Add Comment]
- 4) Do you have any additional general feedback on this topic?
[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
[Add Comment]
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
[Add Comment]
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
[Add Comment]
- 4) Do you have any other feedback on this topic?
[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?
No. Track B is important – it gets HVAC contractor buy in. When you force the rater to do all of the HVAC design/commissioning, you are shifting liability on to that rater for something that we are not licensed to do. I am uncomfortable with this change and do not support it.
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
Track B creates a better HVAC system. The HVAC contractors receive training to design and install these systems when using Track B, and they are the licensed professionals. Raters should not HAVE to be responsible for this. Track B also



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

allows for a faster testing time and keeps the price lower for these services – if raters have to add on hours and additional training/equipment to do HVAC grading everytime, as well as creating the design report, it's going to significantly up the cost.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

No, I do not support this change on any timeline.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

Definitely not. Those tasks are dangerous and require additional equipment. Now you're telling me I need to be an energy rater, an HVAC contractor, and an electrician? No thank you.

- 5) Do you have any other feedback on this topic?

Please don't sunset Track B. Please do not require HVAC grading.



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Proposal to sunset the Water Management System Builder Requirement

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



ENERGY STAR Single-Family New Homes Program, Rev. 14

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 Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Green Your Home LLC

Respondent Last Name: Fitz-Gerald

Respondent First Name: Colleen

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

I think good builders will always incorporate these details. We need to look at the average builder, who will VE this immediately if it is not required. This WILL impact home performance, which is why it has always been mandated.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

No, it will serve as a path to least resistance, cheapest construction while still being able to get this certification.

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

The verbiage on the checklist allows raters to say "yes I've evaluated it" as long as the rater looks at it they can check it off, it doesn't have to be right, just got looked at. It doesn't have enough detail to give the rater much leeway to hold the builder accountable because it's just the rater's opinion at that point, not a requirement.

I think these items should stay because they are not required by all codes, so this is the last way to hold builders to account.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes, because they are still held to account by the blower door test.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

I think the blower door test holds them to account.

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes, I see it all the time.

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

I think this is a good simplification.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

I do. I am not a big fan of builder verified items. I think it would be better to say they can verify it up to 10% but it must be documented via photos to the rater, essentially making it rater verified. I typically use these as an opportunity for the builder to photographically document a correction, telling them to make sure there is enough context in the photo for me to tell it is the same location. Typically if there is a correction I have marked up the framing or subfloor so that I can see my own notes in the photo as well as the updated condition. This will be especially important as we move into the requirements coming for rating documentation for every rating to be turned in at time of rating instead of only if the home gets QA'd.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this item during their inspection?

This should be verifiable by the rater, I have never had a project I couldn't verify this on, been doing this since 2009.

- 4) Do you have any other feedback on this topic?



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?

NO!!! Raters have no business performing the majority of Standard 310 testing. It is out of their wheelhouse and they cannot diagnose problems identified by testing results, identify misuse of tools or incorrect test results. Not to mention this requires buying a whole new set of tools. I cannot imagine there are many raters out there that are confident in this skill. I am not confident after taking 3 trainings on it and practicing on systems. During my live in field training, the instructor, the owner of a large national rating provider, couldn't accurately perform the testing and couldn't figure out why. This alone speaks volumes about my point. It is not something I want to do, or think I should be doing. Sunsetting Track B could sunset my Energy Star work.

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

I think it would be detrimental to the Energy Star programs reputation if this happens. It will result in headaches and mistakes, inaccurate work that will drag the name down. Have the correct professional, an HVAC tech, do the heavy lifting (Blower Fan Airflow, Watt Draw and Refrigerant Charge) and have those results/reports be rater verified or completed by a third party HVAC Verifier.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

I do not think this change needs to happen at this time.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

I like when test results can be modeled and those inputs can incentivize compliance and is rewarded for going above and beyond. I think 4 and 5 being optional is a great way to incentivize honest compliance while we figure out who should perform these and other tasks. I am also more comfortable with raters performing task 3 than 4 or 5.

- 5) Do you have any other feedback on this topic?

I also think Track A is the superior method. Have you considered developing an HVAC Certified Contractor Field Checklist that the Certified HVAC company would then turn in, similar to what the rater turns in. This could be done by the installing contractor and verified by the rater or, even better, a third party HVAC contractor could verify without the rater. I think Track B should stay until accurate testing can be achieved on a wide scale. We are not there yet. Keep Track B while you develop an HVAC Field Contractor Checklist. Do not lean on raters to perform tasks 3-5. The ERI points should get people incentivized to make Track A the desired track without having to sunset Track B. At 3:52 of the presentation it was stated that "we couldn't really put raters in a position to second guess structural engineers for example..." I think the same thought process holds true here, we aren't qualified to perform testing and figure out corrections. I like the idea of all rater verified items, but is that the best practice for major systems that have such a large impact?

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?

Yes, these are almost always followed at this point. They are also almost always required by the code. This is basic building durability and doesn't have as much to do with the actual energy performance of the building. It is also not captured in the models.

- 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?

I like the idea of all rater verified items, but is that really the best practice to have for major systems?



ENERGY STAR Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: Keen Living LLC

Respondent Last Name: Miller

Respondent First Name: Anna

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
Unsure, but most high volume builders won't do anything that adds complexity or cost unless it's required for certification or code compliance.
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
Most high volume builders, or those new to the program, will only consider these details if there's a significant impact on the ERI.
- 3) Do you have any other feedback on this topic?
If Energy Star wants most homes to have these reduced thermal bridging details, they must be mandatory or have a significant impact on the ERI.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
Yes, the reorganization and edits included in the presentation are reasonable.
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
Offer an online checklist that changes based on climate zone and other inputs. This will declutter the list based on project details and be much easier to work with.
- 3) Do you agree that the newly proposed leakage limits are achievable?
Ventilation challenges in humid climates must be addressed before tighter homes are required.
- 4) Do you have any additional general feedback on this topic?
Do not allow whole house ventilation strategies that mechanically-induce infiltration through negative pressure in humid climates. Require humidity control in humid climates. These items are more important than an ACH backstop.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
Yes
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
Yes
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
Yes
- 4) Do you have any other feedback on this topic?
No

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

- 1) Do you agree that it is appropriate to sunset Track B?
No. The HVAC credential is easy to get and introduces installers to the program.



ENERGY STAR Single-Family New Homes Program, Rev. 14

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- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
It encourages installers to own their work and understand how to commission it instead of forcing raters to pick up the slack.
- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?
No, we've bid on proposals that will likely have permits after that date without knowing additional tasks would be required of raters.
- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?
No, these items are outside the scope of an Energy Rater. Checking watt draw is a safety risk and will likely raise insurance costs. And refrigerant charge cannot be accurately measured by the rater. There are also additional equipment and training costs, and time onsite will increase.
- 5) Do you have any other feedback on this topic?
Recommend you require the installer do Tasks 3-5 instead of the full commissioning checklist. Many are not doing the Commissioning Checklist anyway because the Rater is not required to collect it. This offers a middle ground and maintains boundaries between the role of Energy Rater and HVAC installer.

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?
Unsure. I don't know that it's effective because no one is checking to make sure they do it. And a lot of the items are required by code anyway. But I'm hesitant to say drop it completely because the information is valuable.
- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?
Lists of best practices are helpful in single family residential construction, especially for small builders and for locations that have no code enforcement.
- 3) Do you have any other feedback on this topic?
No



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Comments Received

Organization Name: Leading Builders of America

Respondent Last Name: Crone

Respondent First Name: Phil

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

We are unsure how this will be reflected in energy modeling. For example, how will advanced framing be represented in the baseline home vs an “as designed” model and how will these changes impact HERS scores?

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Most likely not. Much of this is addressed in other codes or standards.

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

As with our feedback on Track B below, LBA would like to convene a follow up discussion with EPA and our member stakeholders.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes, and we appreciate EPA’s receptivity to substituting prescriptive details for objective and verifiable performance.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

Yes, we should explore the further reduction or elimination of remaining air sealing details, on an optional basis, if lower air leakage rates are achieved.

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes, the proposed limits are achievable.

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

We believe this approach can contribute to finding reasonable and practical pathways to certification in instances where predrywall inspections are missed.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it’s appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

[Add Comment]

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes, potentially. However, it was not clear from the presentation how this would be done and how these items would be verified since they are installed during framing.

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

We are unsure without more specifics. It is unclear from the presentation.

- 4) Do you have any other feedback on this topic?

[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?

No, we do not feel that this is appropriate to sunset Track B either now or in the foreseeable future. Numerous LBA member commented about challenges from market to market finding trained staff to support an exclusive move to Track A.



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

Raters in several markets lack the knowledge or equipment to pursue track A. They have to rely on installers who often have no interest in performing this testing. Some members were concerned that removing Track B may reduce the amount of measures builders are employing that can receive credit in the energy modeling.

3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

No, most of our members who weighed in on Rev. 14 feel that the market is not ready to make this change by 2026.

4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

Feedback on this varied among members. We'd be happy to convene a discussion with the EPA team to discuss these details further.

5) Do you have any other feedback on this topic?

[Add Comment]



ENERGY STAR Single-Family New Homes Program, Rev. 14

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?
Yes
- 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 Single-Family New Homes Program, Rev. 14

Comments Received

Organization Name: MaGrann Associates

Respondent Last Name: Pelosi

Respondent First Name: Kim

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

For SFNH, we support this update.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

[Add Comment]

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

[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes, we support these updates.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

[Add Comment]

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes, and we also support the alternative pathway proposed for townhomes.

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

[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

[Add Comment]

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

[Add Comment]

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

[Add Comment]

- 4) Do you have any other feedback on this topic?

[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?

This will be easier to implement in SF than MF, but EPA should still consider that this will still result in additional rater costs which may be challenging for the SF market to absorb.

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

See above comment.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will



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be brand new?

For SF, this should be enough time.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

[Add Comment]

- 5) Do you have any other feedback on this topic?

[Add Comment]



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Proposal to sunset the Water Management System Builder Requirement

- 4) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?

We support this.

- 5) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

[Add Comment]

- 6) Do you have any other feedback on this topic?

[Add Comment]



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: National Association of Home Builders (NAHB)

Respondent Last Name: Manz

Respondent First Name: Amy

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
[Add Comment]
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
[Add Comment]

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

NAHB believes this is a reasonable revision and opportunity to increase flexibility. NAHB recommends the development of in depth guidance to raters on expectations for modeling of homes with and without common thermal bridging details to ensure consistency between homes in the program.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
[Add Comment]
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]

- 3) Do you agree that the newly proposed leakage limits are achievable?
[Add Comment]

- 4) Do you have any additional general feedback on this topic?
[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Entirely eliminating items from the list that can be builder verified extremely limits the flexibility for builders in implementing this program and may prove unwieldy to complete certification when construction sequencing doesn't fit the needs of the SFNH program. Increasing the number of items partially builder verified allows for flexibility needed for residential construction.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

We disagree. EPA did not provide sufficient justification for reducing the allotment from 8 to 5 items.

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

This proposal assumes that builders will utilize a shaftliner system for the area separation wall. Newer UL assemblies are on that market that utilize different materials than double layer of 1" thick drywall have widely varying configurations and inspection of the gap will be more difficult.

- 4) Do you have any other feedback on this topic?

Specifically opposed to eliminating all builder verification of items 1.1 and propose that at a minimum builder's be allowed to partially verify this item specifically around installation of skylights and windows that are not easily accessible. Windows that require ladders or scaffolding to access may be installed out of sequence and removal of label for cleaning may be done earlier than typical windows.



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

- 1) Do you agree that it is appropriate to sunset Track B?

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) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

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

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

Tasks 4 and 5 are skills that licensed HVAC contractors are capable of performing but are a challenge to the typical HERS rater. Requirements for Task 4 and Task 5 only make sense when comparing homes installed and commissioned by a qualified HVAC contractor under Track B with homes commissioned by a rater under Track A .

- 5) Do you have any other feedback on this topic?

If the Energy Star program is concerned about the quality of system installations maintaining Track B, we recommend re-introducing the requirement for submission of the HVAC Commissioning Checklist to the rater for review as a reasonable compromise compared to the elimination of Track B entirely.

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]



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: North American Insulation Manufacturers Association (NAIMA)

Respondent Last Name: Vandever

Respondent First Name: Jason

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

Yes

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Hopefully

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

I would caution Energy Star to think about potential unintended consequences related to the attic edge revision and/or perhaps rater variability in the application. Also, something to think about for the future is the need for how slab height changes as applied to slab edge insulation should be modeled.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

No. It is crucial for Energy Star to maintain its reputation as a leading program. Comfort issues can arise if ducts are not tested for air leakage, regardless of whether they are in conditioned spaces or not. Energy Star already excels in its HVAC requirements and verification processes, and there is no need to remove the testing requirements for ducts in conditioned spaces. Standard sealing practices should be applied to all ducts, regardless of their location. Ducts in conditioned spaces are allowed twice the leakage rate of those in unconditioned spaces, so if standard sealing practices are followed, the likelihood of failure should be very low. Relaxing these requirements is unnecessary.]

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

No

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes

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

No

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes and no. Those are reasonable distinctions but in general, you want to eliminate any builder verified items. If absolutely necessary, the builder can submit photos to the rater for verification. Those instances should be kept to a minimum.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes. Generally, you want to eliminate any builder verified items. If absolutely necessary, the builder can submit photos to the rater for verification. Those instances should be kept to a minimum.

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

Yes

- 4) Do you have any other feedback on this topic?

No



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

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

1) Do you agree that it is appropriate to sunset Track B?

Yes

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

Not that I can think of

3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

More than sufficient

4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

Undecided

5) Do you have any other feedback on this topic?

No

Proposal to sunset the Water Management System Builder Requirement

4) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?

No comment

5) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

No comment

6) Do you have any other feedback on this topic?

No



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

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

Respondent Last Name: Zeis

Respondent First Name: Cindy

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

Yes, as stated in the webinar ANSI/RESNET/ICC 301 is continually advancing resulting in more reliable capturing of thermal bridging details.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Yes, this will hopefully encourage design professionals to increase their proficiency and add these details to their design drawings. This will hopefully also encourage design professionals to include raters/verifiers at the design stage.

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

Not at this time

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes, as it pertains to air sealing. Since item "d" includes elimination of gasket beneath above-grade sill plates it may be beneficial to still require the sill seal for walls "resting atop concrete/masonry" since this is an area where moisture migration may be an issue in addition to air sealing benefits.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

Not at this time.

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes – the 4.0 – 4.5 ACH limits align with and/or exceed most code and program requirements and appears to already be met in >70% of current ES certified dwellings. In many cases, this aligns with being an "above code" requirement for AHJs adopting the 2021 IECC.

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

Consider using a CFM50/sf enclosure area metric instead of ACH50. Or, as an alternative if ACH is desired for specific applications the ability to use ACH50 or CFM50/sf.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes, as long as there is sufficient clarification in the footnotes clarifying the 10% allowance.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

Yes – since this is a typical area of concern/failure for unit compartmentalization, we agree this area should not be included as a builder-verified item e.g., the rater/verifier must inspect this detail.

- 4) Do you have any other feedback on this topic?

Not at this time.



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

- 1) Do you agree that it is appropriate to sunset Track B?

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.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

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.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

[Add Comments]

- 5) Do you have any other feedback on this topic?

The HQuitto credentialing process does not necessarily guarantee proper installation and commissioning of systems. As an alternative, if Track A is kept as optional, make the commissioning checklist required with some rater verified items such as airflow, and measures that do not require specialized licensure and knowledge such a electrical for power measurements. We have to acknowledge the variety of skill levels of 3rd party verifiers and avoid unintended consequences of decreased program and partner participation while also acknowledging the work of skilled HVAC installers and designers. We need a policy that supports flexibility and promotes cross-trade collaboration.

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?

Yes

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

[Add Comments]

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

Not at this time



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: PEG, LLC.

Respondent Last Name: Cooper

Respondent First Name: Matthew

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

Yes, we believe that most builders have adopted reduced thermal bridging best practices and that this requirement can be made optional.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Yes

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

No

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

No

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes

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

No

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

Yes

- 4) Do you have any other feedback on this topic?

No

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

- 1) Do you agree that it is appropriate to sunset Track B?

Yes

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

No, it is one of the primary programmatic obstacles to consistent certification.



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- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?
More than sufficient.
- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?
Absolutely
- 5) Do you have any other feedback on this topic?
Without requiring Tasks 4 & 5, the value of grading is significantly diminished.

Proposal to sunset the Water Management System Builder Requirement

- 4) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?
Yes
- 5) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?
No
- 6) Do you have any other feedback on this topic?
No



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: Profit Line Solutions

Respondent Last Name: Mirll

Respondent First Name: Lon

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
Absolutely. Most of the homes I model would perform BETTER than would result by strictly following Energy Star's mandatory measures. Better and at lower implementation cost.
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
Yes. No doubt about it.
- 3) Do you have any other feedback on this topic?
My builders WANT to build better homes. Your current mandates DISCOURAGE them from doing so.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
Yes, absolutely, for each one you have detailed
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
The majority of homes I inspect do not have backdraft dampers on bath/laundry exhaust fans or kitchen hood fans.
- 3) Do you agree that the newly proposed leakage limits are achievable?
Most of the homes I rate surpass the limits you propose. Using the backstop as you propose will certainly encourage the market in the right direction.
- 4) Do you have any additional general feedback on this topic?
ASHRAE report potential air changes for specific measures. You should too. See "NAIMA 5 Priority Air Sealing Locations for New Homes"

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
Yes. Good plan.
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
Yes. It scales very well.
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
YES
- 4) Do you have any other feedback on this topic?
Good plan!.

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

- 1) Do you agree that it is appropriate to sunset Track B?
Yes. I believe this will also give raters leverage to change the practices of HVAC contractors.
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

No.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?
No. They would constitute unnecessary, counter-productive constraints which would discourage innovation, and would far outweigh the benefits.

- 5) Do you have any other feedback on this topic?

Tasks 1-3 will help to achieve the most important objectives. In my market, HVAC contractors do NOT do designs nor design reviews. They do NOT seal ducts. And they do NOT perform a Manual S to properly size equipment. I believe your proposals will give raters leverage to change all that. Trust the raters to implement Tasks 4 and 5 as they see fit. Do not encumber them with mandates.

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?

Yes

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

No

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

This is one of the areas where local builders are justified in trusting their own knowledge, experience, and judgment better than EPA. We get 16 inches of rain each year. You should focus on what you do best and let them focus on what they do best. Now, about what you do best: Your current prescriptive mandates are (too often) un-sustainable and counter-productive, defeating your own purposes of building energy efficient homes. One singular example: the cost margin for insulating a slab may be \$2000 whereas it may save only \$20 per year. That's a 100 year simple payback. Your proposals for Rev 14 could change all that.



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: RESNET ELC Standards Committee

Respondent Last Name: Christesen, Woods

Respondent First Name: Julie, Corey

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
[Add Comment]
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
[Add Comment]
- 3) Do you have any other feedback on this topic?
[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
[Add Comment]
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]
- 3) Do you agree that the newly proposed leakage limits are achievable?
[Add Comment]
- 4) Do you have any additional general feedback on this topic?
[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
[Add Comment]
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
[Add Comment]
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
[Add Comment]
- 4) Do you have any other feedback on this topic?
[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?
No
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

Yes. Energy Raters are not HVAC experts. We do not have the KSA's to become HVAC people. We need the HVAC contractors to understand Energy Star principals and to continue to work with raters to provide the best outcome – this takes away all incentive for HVAC people to learn how to install to Energy Star standards. Raters are not credentialed



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

HVAC professionals and we are not qualified to take this work out of the HVAC contractors hands. The new equipment requirements are incredibly expensive and cumbersome to procure and take with raters to the jobsites, not to mention working with electricity (watt draw) is dangerous. I don't think the flow grid equipment will be able to keep up with all the different kinds of HVAC equipment on the market, and what happens if it just isn't possible to grade the equipment with a flow grid? Are raters expected to purchase many of the "cut it to size" grids to have on hand for different systems? It's going to add a significant cost to the price of doing Energy Star for builders. This will outprice the rebates that are currently offered, will make ratings take significantly more time, and will add to the raters already heavy burden.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

No, in general, this group does not agree with sunseting Track B at all, regardless of timing.

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

Absolutely not

- 5) Do you have any other feedback on this topic?

Generally, we think this is an incredibly expensive and cumbersome new requirement. It does not provide any benefits that we (the ELC standards committee), can identify. This creates a strange new workflow with the Energy Rater becoming responsible for parts and pieces of the HVAC system in a very awkward way. You are creating a liability for any design issues by putting it on the rater and not the HVAC contractor, who is licensed to do this work.

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]



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: RESNET

Respondent Last Name: Scott

Respondent First Name: Doyle

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
Yes, given that enforcing advanced framing is difficult for raters, when they can be overridden by “claimed” structural engineering requirements that they are not qualified to disagree with.
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
Not sure that this will be a big factor.
- 3) Do you have any other feedback on this topic?
The change makes sense because this is a difficult element to enforce prescriptively and creates the need for raters to memorize or quickly reference a lot of footnotes and exceptions. It is in line with other changes that seek to lean more on overall performance rather than prescriptive checklist. There are also improvements to the advanced framing description in the new ANSI 301 versions that will help ensure this gets captured properly in the modeling.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
Yes, but with a caveat. The current air sealing requirements are helpful for raters because it gives them the ability to “fail” and reinspect when air sealing details are not done correctly. If I was a rater, I would still want to hold builders to these prescriptive requirements for the most part- because that will help ensure they don’t fail on the back end by missing their infiltration target.
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]
- 3) Do you agree that the newly proposed leakage limits are achievable?
Yes, for most markets. Where code requirements are weak or not enforced, this may be a lift for some builders. But is it achievable in single family detached homes? Certainly
- 4) Do you have any additional general feedback on this topic?
From a Certification Review standpoint, this is a helpful change because a homeowner may find missing foam on a three foot length of sill plate in their crawlspace and try to claim their home doesn’t deserve the label. Many other air sealing details are not even visible at final, so we’re already leaning on a “proof is in the pudding” concept on an occupied home by using the infiltration test.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it’s appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
Yes.
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
Yes, there is less need because there are fewer prescriptive items.
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
It depends on the construction type- might be impractical for many projects. We suggest evaluating and giving strong consideration to the feedback that you receive from raters on this question.



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4) Do you have any other feedback on this topic?

[Add Comment]

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

1) Do you agree that it is appropriate to sunset Track B?

Yes

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

[Add Comment]

3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

That depends on whether the EPA is expecting all verifiers who conduct ENERGY STAR inspections to become Std. 310 (HVAC Grading) certified. This would require that any Provider that offers ENERGY STAR would need to have a Std. 310 certified QAD on staff who is able to conduct on-site training & certification requirements for all ENERGY STAR verifiers. This would be a significant investment for large providerships, especially those with a vast regional presence. However, this may be required if the EPA intends to require Tasks 4 & 5 in future iterations of the ENERGY STAR program or if these addresses are expected to receive credit in the rating software (see item #5 feedback below). Alternatively, if the EPA simply requires additional training for Energy Star certified verifiers in order to conduct tasks 1-3 of Std. 310 (specifically system airflow), this timeframe is likely sufficient assuming the required training could be delivered quickly.

4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

We agree that Tasks 1, 2 and 3 should be included in this first stage of a mandatory Track A. We also believe that Task 5 Refrigerant Charge should be required to be completed as this is a very important step of HVAC Grading in ensuring that an HVAC system is properly installed, and will therefore perform optimally. We are content with the omission of Task 4 as we believe that it does not provide as much value in ensuring an HVAC system's optimal performance as Tasks 1, 2, 3, and 5; as well as the concerns that there are some potential safety risks in the performance of Task 4.

5) Do you have any other feedback on this topic?

Is the expectation that these ratings would receive credit in the rating software for achieving Tasks 1-3? If so, these ratings (at least for RESNET) would need to be registered as Std. 310 certified addresses meaning the verifiers would need to be Std. 310 certified & the Providers would need to conduct Std. 310 quality assurance. Or is the expectation that Tasks 1-3 would need to be recorded as an ENERGY STAR requirement on the appropriate checklists but not receive credit in the rating software?

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?

Yes.

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]



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: Tacoma Energy

Respondent Last Name: Johnson

Respondent First Name: John

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

No, we have implemented this and going backwards does not speak well for the ENERGY STAR program.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

No

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

Like I have stated, if this is suggested it will not happen. This will put more pressure on the Raters to still pass the home ENERGY STAR. The Builders know this is a requirement which is also a code requirement since 2006.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Some yes and some no. For instance having a 4.5 ACH50 when the building code is 3 ACH50 in my opinion is an issue.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

If the intent in air sealing is to make the homes tighter and control the conditioned air movement in and out of the home with indoor air quality concerns I feel the simplest way to accomplish this is to meet the current model code on ACH50 so as to not cause confusion.

- 3) Do you agree that the newly proposed leakage limits are achievable?

As stated above the model code is dictating this.

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

Even though the changes from 3.0 to 3.1 and now the up coming 3.2 and changes to the new energy codes were to aggressive, the changes have been made. I have always felt advancements in energy efficiency are important. Home ownership is very important. Incremental advances have always been my view and even though this feels like the 2.0 change over a decade ago this over whelming change to the model code and the administrations mandates doesn't line up. Confusion is not a good thing

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

yes

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

I have no opinion on this.

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

They should but this is very difficult if the rater has not been involved in party wall air sealing.

- 4) Do you have any other feedback on this topic?

Air sealing has become a very important item in the energy efficiency of a home. This is why as I stated above that the model code has moved to 3 ACH50. This causes the air sealing to be done properly. Having a ACH number higher than the municipalities building code seems counter productive, questionable.



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

1) Do you agree that it is appropriate to sunset Track B?

Yes

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

No

3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes

4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

If you don't include task 4 and 5 what's the purpose. Refrigerant charge is important more so now than ever. We have had to train many HVAC vendors how to do the weigh-ins. I don't think that speaks very well for our industry.

5) Do you have any other feedback on this topic?

No

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?

Yes

2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

No, builders have been doing this since building began.

3) Do you have any other feedback on this topic?

No



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: TRC

Respondent Last Name: Beaulieu

Respondent First Name: David

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

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

Yes, provided that the required ERI score and relevant IECC requirements are still enforced.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Yes, we agree that the newly proposed items will encourage partners to consider and plan for implementing details that reduce thermal bridging. However, once no longer mandatory, some items may be lost or fall out of common practice. Suggest developing guidelines to help builders and raters manage these items on their own, and clarify that the thermal bridging details are still part of the rating process, even if it is not part of the ENERGY STAR checklist process.

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

TRC supports the proposal to eliminate the reduced thermal bridging details, and generally supports all of the Rev 14 goals and the paring down some of the various exemption and exception documents. Although not mandatory, it could still be valuable to have a separate document of best practices so they are not overlooked for lack of detail.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes, these edits make sense and add clarity.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

None

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes, new goals are reasonable and achievable.

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

The proposed 4.1.9 wording is much clearer and should resolve the confusion that currently exists with this item.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes, this is appropriate and classification of each item by responsible party will be helpful.

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes this is justified.

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

TRC agrees that Item 4.1.2 should not be eligible for builder verification. However, on-site rater verification for 100% of fire-rated separation walls may not be possible due to construction phasing, particularly with townhome developments. Some allowance or exception should be permissible, but on a limited basis.

- 4) Do you have any other feedback on this topic?

No other comments

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



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

1) Do you agree that it is appropriate to sunset Track B?

Yes, although there may be some benefits to retaining Track B, TRC generally agrees that it is appropriate to sunset Track B. TRC further agrees that this item has caused confusion in the past, and TRC supports the revision intent to lessen confusion and streamline the process.

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

TRC has observed Track B being used successfully in cases where raters were reluctant to test HVAC equipment due to liability concerns or lack of expertise. In these cases, there may be benefits retaining a simplified Track B compliance path, which may be ideal for those who already have an effective workflow and trusted HVAC contractor relationships.

3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes, a 1/1/2026 transition date should be sufficient time for transitioning.

4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

TRC has observed commissioning issues related to refrigerant charge and believes completion of Task 5 should be required at some point. TRC has found few issues with blower fan watt draw, and has no opinion on making Task 4 mandatory.

5) Do you have any other feedback on this topic?

No other comments.

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?

Yes, TRC agrees that it is appropriate to sunset the Water Management System Builder Requirements.

2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

TRC finds no significant benefit to maintaining the WMS builder requirements.

3) Do you have any other feedback on this topic?

Please consider developing a best practice guide for WMS details to serve as a builder resource.



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: Universal Engineering Sciences

Respondent Last Name: Leatherbury

Respondent First Name: Sean

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
Yes
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
[Add Comment]
- 3) Do you have any other feedback on this topic?
I think they all should remain except item 3.1, the R-21 to edge requirement. That one doesn't provide any meaningful improvement and seems to exist just to make this program a giant pain in the ass.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
Yes
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]
- 3) Do you agree that the newly proposed leakage limits are achievable?
[Add Comment]
- 4) Do you have any additional general feedback on this topic?
I don't have any arguments against most of the items but item 4.5, drywall sealed to top plate. It's stupid. It's impossible to verify any kind of sealant that makes any sense and sealing from the top side is unnecessarily dangerous. I absolutely agree with the need for sealing bottom plates

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
No
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
No
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
[Add Comment]
- 4) Do you have any other feedback on this topic?
[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?
No
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?



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Track A is unreliable and not worth having without the refrigerant charge verification. Track B gives SOME kind of indication that the system is going to fail when the weather gets hot.

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

No

- 5) Do you have any other feedback on this topic?

Task 4 is so easy there's no reason not to do it, Task 5 is unreliable as a non-invasive test or relies too heavily on field work that HAS TO BE CORRECTLY RECORDED ON THE FIRST TRY. If the startup tech forgets to take his photos, there is no second chance. I can't tell the builder/HVAC company "Oh, you need to do it again for the photo." I don't know how to make this part better, I only know that this is broken.

Proposal to sunset the Water Management System Builder Requirement

- 4) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?

Yes

- 5) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

No

- 6) Do you have any other feedback on this topic?

[Add Comment]



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: Urban Homeworks

Respondent Last Name: Lassiter

Respondent First Name: Azad

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
[Add Comment]
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
[Add Comment]
- 3) Do you have any other feedback on this topic?
[Add Comment]

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
YES
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
[Add Comment]
- 3) Do you agree that the newly proposed leakage limits are achievable?
YES
- 4) Do you have any additional general feedback on this topic?
I think that the total air leakage requirement is too high. Even for a national program. There are some states that have better code requirements. Should energy start not be better than code? Air leakage under 3 is very achievable without special construction. I think the air leakage should be 2.5 ACH or lower. Or switch it to cfm50/ft2 to take away the advantage of larger homes.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
[Add Comment]
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
[Add Comment]
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
[Add Comment]
- 4) Do you have any other feedback on this topic?
[Add Comment]

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

- 1) Do you agree that it is appropriate to sunset Track B?
[Add Comment]
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

[Add Comment]

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

[Add Comment]

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

[Add Comment]

- 5) Do you have any other feedback on this topic?

[Add Comment]

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]



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: US-EcoLogic

Respondent Last Name: Candas

Respondent First Name: Derin

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 1) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
No. This will open up the possibility of not attempting any reduced thermal bridging techniques.
- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
Yes, but making reduced thermal bridging details optional will lower consideration overall.
- 3) Do you have any other feedback on this topic?
More emphasis should be made on the documentation, availability, and limitations of structural exemptions.

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
Yes
- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?
No
- 3) Do you agree that the newly proposed leakage limits are achievable?
Yes
- 4) Do you have any additional general feedback on this topic?
It would be great to see an infiltration backstop added. The intent of the air sealing requirements would translate to a quantifiable result.

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?
Yes
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?
Given the other revisions go through, reducing the builder verified items is justified.
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?
Yes
- 4) Do you have any other feedback on this topic?
Further clarification should be made on how builders should provide evidence on the items they verify.

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

- 1) Do you agree that it is appropriate to sunset Track B?
No.
- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?
There are a variety of reasons why Track B should remain an option. In previous revisions, HVAC Credentialing was the only option, and contractors had to register with ENERGY STAR similar to how all energy verifiers must be registered.



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

HVAC Grading allows verifiers to help builders achieve ENERGY STAR certification in markets where there are not credentialed HVAC contractors, and HVAC Credentialing allows credentialed HVAC contractors to help achieve certification in markets where verifiers are not HVAC grading assessors and have no way to measure blower fan airflow other than using OEM static pressure tables. This also creates scenarios where verifiers will have to charge more for additional services, which may be difficult especially when HVAC contractors will not necessarily reduce their prices, which may ultimately lead to decreased participation in ENERGY STAR for Homes.

3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

Yes

4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

No.

5) Do you have any other feedback on this topic?

I personally discourage eliminating Track B because it will reduce some builders' abilities to participate in this program.

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?

Yes

2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

There are many jurisdictions within the United States that do not adopt or enforce codes. These are areas where the Water Management requirements would not be considered redundant.

3) Do you have any other feedback on this topic?

Overall, this portion of the program lacks oversight, and with local codes requiring many of these requirements, sunsetting Water Management seems acceptable.



Rev. 14 of the ENERGY STAR Single-Family New Homes Program Comments Received

Organization Name: Xcel Energy

Respondent Last Name: Buchanan

Respondent First Name: Robert

Comments:

Proposal to eliminate mandatory reduced thermal bridging details

- 4) Do you agree that converting the mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most homes?
Yes
- 5) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?
Yes
- 6) Do you have any other feedback on this topic?
No

Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?
No. Gaskets for the sill plate are an important feature for air sealing between two different building materials with different and inconsistent finishes. Concrete foundations cannot be flush with a bottom plate; thus, the gasket fulfills a need at a point of known building deficiency. That the measure is not correctable should be immaterial; as with insulation inspections, a builder can establish protocols to verify correct gasket installation prior to progressing beyond the stage where correction is possible. Disqualifying a dwelling from the certification is a natural and acceptable consequence for failing to meet this measure, even though failure is locked in early in the build process, as disqualification will reinforce the importance of the measure and transform the market to represent the consistent quality that is typically associated with the ENERGY STAR® (E*) label. This measure is an essential piece of ensuring healthy and durable homes. In the presentation, it is specifically called out as mitigating moisture migration from concrete into wood. Gasketing the bottom plate is a health issue insofar as preventing moisture migration logically mitigates mold (mitigate water = mitigate mold). It is also a durability issue insofar as it mitigates rot and thus building failures. An E* home that is nominally efficient but not healthy or durable risks degrading the credibility of the ENERGY STAR label. That the infiltration requirement can be met with other means is even more problematic; air movement and heat is what will enable damp assemblies to dry. If infiltration is met by other means, the drying capacity via infiltration will lessen, exacerbating problems that could readily be met with a sill gasket.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

No

- 3) Do you agree that the newly proposed leakage limits are achievable?

The leakage backstops should be lower. 4.0 ACH50 is consistent with code minimums in the latest edition of IECC 2024, and that is limited to Department of Energy Climate Zones (CZ's) 0-2; colder climate zones require minimum ACH50 of 3.0 in IECC 2024. E*, in an effort to stay ahead of code, should set its ACH requirements to be more restrictive than code minimums. Since there will likely be considerable lag between IECC 2024 adoption and a new E* version, the time to tighten up infiltration requirements is with this revision. Our experience with home builders in the climates we serve, predominantly CZ's 5 and 6, indicate that achieving lower ACH50, around 3.0, is not onerous for home builders. It simply requires attention to detail. That attention to detail is better-aligned with the recognition for quality that is typically associated with E*. In addition to existing market practices, a backstop of 4.0 ACH50 is also too high due to the direct connection between air infiltration and HVAC loads. In support of increasing building efficiency, downsizing HVAC equipment, and making decarbonization more feasible, E* homes should require a more ambitious ACH50 of 3.0 for all climate zones. Finally, it is widely known in the home building industry that the HERS index, infiltration rates, and E* are biased towards larger homes. E* indirectly acknowledge this by allowing for a CFM50 psf (per square foot) of dwelling enclosure area. To de-bias the E* new homes program to the benefit of larger homes, the same metric of CFM50 psf of enclosure area should also apply to homes greater than 5,000 sqft. Thus, builders – especially large, custom, luxury home builders – cannot rely on enclosed volume as a crutch to help label their homes as E* certified. We recommend this figure be 0.25 CFM50 psf to align with the proposal above of 3.0 ACH50, but if the recommendation of 3.0 ACH50 does not carry, 0.30 CFM psf for large homes, as is proposed for smaller homes, would



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be an alternative.

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

[Add Comment]

Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?

Yes

- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?

Yes

- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?

Yes

- 4) Do you have any other feedback on this topic?

No

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

- 1) Do you agree that it is appropriate to sunset Track B?

Yes

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

[Add Comment]

- 3) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?

No comment

- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?

For homes with Air-source heat pumps, yes, to ensure proper commissioning and performance vis a vis nameplate efficiency.

- 5) Do you have any other feedback on this topic?

No

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?

No

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

Yes, as the water management requirements affect building durability. It is widely know within the building science community that better insulation and reduced infiltration increases the need for better water management as the energy available to dry building components that get wet is substantially reduced. Moreover, the consequences of poor water management often take decades to manifest themselves, so the impacts of these failures in water management will be invisible for a long time and may be difficult to tie to bulk water management after such a long time. That they are required by code should not determine whether it should remain within the E* requirements. With so many production builders committing to E*, this is another layer to ensure long-term durability in these homes. Additionally, that these measures are required by Indoor AirPlus is immaterial, as that is not a requirement for E*3.2 certification.

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

Some measures that are not tied to bulk water management and durability can be revisited or removed, but the



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requirement should not be wholly sunset.