

Florida Regional Guideline ENERGY STAR v3 Qualified New Homes Comments

This is a compilation of all comments received by EPA during the Florida ENERGY STAR Qualified New Homes comment period ending May 27, 2011.

The following comments have been compiled from the Florida ENERGY STAR New Homes Proposed Guidelines Comment Forms submitted by respondents. The Environmental Protection Agency is not responsible for any typographical errors or omissions.

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ENERGY STAR New Homes Proposed Guidelines Comment Form

Organization Name:Chesapeake Utilities Corp DBA Florida Public Utilities

Respondent Last Name:Ranck

Respondent First Name: Scott

Comments:Currently, Florida uses the energygauge software for multiple things. We use it for code compliance, Manual J load calculations and the HERS Rating process. Most HVAC contractors use the manual j in this software. The problem is it is whole house not room by room. Do you know if energygauge will be updated to have room by room calculations, will an HVAC contractor be required to buy and use manual j with room by room capabilities or will energygauge be our standard since it is the software recognized in the FL bldg code? Our new code will allow other software to be used for code compliance but currently only energygauge is specified.

Also, IECC stipulates a standard for appliances and you either meet it or you don't. FL energy code still gives credit for upgraded equipment efficiencies. Will this come into play at all with ENERGY STAR? Currently, we gain HERS points by using say gas tankless water heaters. The IECC seems to remove that credit if I'm correct.



ENERGY STAR New Homes Proposed Guidelines Comment Form

Organization Name:Energy House Technology

Respondent Last Name:Tschosik

Respondent First Name: Bruce

Comments:Due to the low heating requirements for Florida, particularly South Florida, I am asking that AC units with heat strips be allowed, in lieu of just heat pumps.

On another note concerning the AC performance testing, if a Manual J and D are performed, and static pressure testing is done on the system, along with an overall airflow test (air flow through the air handler, for example), I think it would be best if the tight tolerance testing of air flow for each room be dropped. This is a big unnecessary item to include which I think will frustrate everyone and cause unnecessary costs to the implementation and testing of the AC system.

Thank you
Bruce Tschosik
561-459-0242



ENERGY STAR New Homes Proposed Guidelines Comment Form

Organization Name:Infinite Energy Solutions

Respondent Last Name:Wenzel

Respondent First Name: Jeffrey

Comments:We raters need to have an idea right away on how this will affect the HERS Index calculation without us spending time trying to put in these new values and do analysis work. I have been spending time and money trying to get my builders to V3 energy star and this seems like it could turn away some builders. I am afraid that at the end of the day, all my efforts will result in lost money, wasted time, and lost opportunities because I get my builders to the finish line, and then the EPA extends the finish line once again making it harder to reach. I would simply like to know a good educated guess on about what kind of HERS index point reduction this will bring. If the current target index is a 70 for a home (for example), will these changes reduce that by about 2 points, 10 points, 7 points? Any help will be much appreciated, thank you.



ENERGY STAR New Homes Proposed Guidelines Comment Form

Organization Name: Anonymous #1

Respondent Last Name: Anonymous #1

Respondent First Name: Anonymous #1

Comments: All comments are concerning the Performance Path Only.

Back when the insulation depth vs true value were looked into, all depths were evaluated, a performance curve was developed and true energy savings value vs cost to implement the changes from say R19 up to R-50 were delivered to the stake holders. These efforts of the science community and Energy Star helped stakeholders to become well educated and make wiser insulation choices. The approach was to "fully justify and vet proposed changes" before potentially adding them to a program and causing stakeholders undue cost that are not life cycle cost and ROI justified.

This being said I make request for each version three measure, being a change from version two, have its science justified and presented to all stakeholders in an easily understandable quantifiable manner. This will allow all parties to fully understand what the changes are and their value to their customers and to their respective businesses vs the cost to implement.

Many concepts have been proposed within the new version. Many seem to be a blending of Prescriptive Path mandates and Performance paths, such as, sealing drywall to the wall top plate next to the attic, Windows: ≤ 0.65 U-Value; 0.27 SHGC, multipoint duct leakage testing, whole house duct leakage testing, home size penalties, HVAC Efficiency Increase, Energy Star Roof Products only, wall insulation increases, thermal enclosure checklist, HVAC checklist, Water Management Checklist, Indoor Air Quality Checklist, etc...

But the explanations are in the form of... "this is a new regulation", "we want to implement" or "we have some new leakage pictures that we want stopped". Not much in the way of hard numbers used to justify added cost. Leakage pictures are not quantifiable, they are pretty, but its hard to justify cost based on pictures.

I personally believe that in our effort to reach a goal, we have at times left behind the foundational principals that make us who we are... here are some excerpts from the Energy Star Website...

...History of ENERGY STAR

ENERGY STAR is a joint program of the U.S. Environmental Protection Agency and the U.S. Department of Energy helping us all save money and protect the environment through energy efficient products and practices....

...ENERGY STAR delivers the technical information and tools that organizations and consumers need to choose energy-efficient solutions and best management practices...

...ENERGY STAR provides solutions. ENERGY STAR provides a trustworthy label on over 60 product categories (and thousands of models) for the home and office. These products deliver the same or better performance as comparable models while using less energy and saving money...

I believe, mainly due to the constrictive time constraints placed on good men and women, the very guidelines for Energy Star may become hard to hold. I recommend we take the time to implement the new program right.