From: Steve Saunders
To: ENERGY STAR Homes
Subject: Comments on EPA ES VOO Process
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Should EPA consider eliminating 501(c)(3) or 501(c)(6) non-profit corporation status from the VOO application eligibility criteria, and rely solely on ISO/IEC 17065 accreditation to address impartial governance?

In the long run, EPA should consider consolidating around 17065 accreditation.
Rationale: It is not clear that non-profit status provides any improvement in quality or confidence on outcome. There seems to be little to be gained by having two approaches and it creates the potential for market and energy rating company confusion. While there is no immediate need to make this decision, the size of the market and the revenue per home do not support the economics of two wildly different certification schemes for development of technical and professional expertise.

The best strategy is for EPA to pick the approach that will most deliver quality AND value in the long term. The EPA may wish to see how (and if) 17065 processes improve oversight while lowering costs. Once there is a clear trend in either direction, the EPA should help the participants align around common / overlapping approaches and move forward. In short, this means that sooner rather than later (using good judgement) the EPA should move exclusively to the best viable process. The 17065-accreditation process has a proven track record within the EPA as well as viable examples of well implemented conformance to standards systems across the globe. We would anticipate that a properly structured and well documented 17065 format would be the likely best choice.

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