



DRAFT Caribbean Program Requirements ENERGY STAR Certified Homes, Version 3 (Rev. 10)

Comments:

Currently, Puerto Rico has only four (4) ENERGY STAR certified homes built to date. In part, because of the challenges the industry faces when implementing the Tropics Program Requirement standards. After reviewing the *Draft Caribbean Requirements ENERGY STAR Certified Homes, Version 3 (Rev 10)*, this modified set of requirement goes in accordance with the reality of Puerto Rico's climate and its building construction type. This modification may boost the utilization of such standard in Puerto Rico and therefore promoting the construction of more efficient homes, contributing to the creation of green industry business opportunities.

Below are additional comments on the proposed program requirement.

Section – Partnership and Training Requirement

- The following links do not redirect:
 - www.energystar.gov/homesPA
 - www.energystar.gov/newhomestraining
- The “Field Inspector” is mentioned only in the Partnership and Training Requirement section. At footnote #7, the term “Rater” is defined, but instead of “Field Inspector,” it mentions “Approved Inspector.” Therefore, it is suggested to clarify the discrepancy between the Field Inspector and the Approved Inspector, their roles and task and if they may be the same entity or person.

Section – Energy Certification Process for the Caribbean

- Suggest modifying the last sentence of section 1 to the following: The resulting ERI is not required to meet a specific target value for the homes to be certified if the configuring efficiency measures are equal to or better than Exhibit 1.

Section – Exhibit 1: ENERGY STAR Reference Design

- Suggest adding footnote # 6 at Exhibit 1 and 2 to emphasize that in case of a discrepancy between the Energy Star requirements and the local code, refer to such footnote for guidance.

Section – Exhibit 2: Mandatory Requirements for All Certified Homes

- Typo error at Exhibit 2: Mandatory Requirements of the Rater. Replace 4,5 to 4.5 in items that are exempt from complying with the field checklist.
- Suggest adding footnote # 6 at Exhibit 1 and 2 to emphasize that in case of a discrepancy between the Energy Star requirements and the local code, refer to such footnote for guidance.

Section – Exhibit 3: Energy Star Certified Homes Implementation Timeline for the Caribbean

- At the webinar “Draft ENERGY STAR Caribbean Program Requirements, Version 3” celebrated on July 15, 2019, it notifies that “Once the Caribbean Program Requirements, v3, are finalized, stakeholders would be allowed to use them immediately to certify homes.” Therefore, consider including an asterisk (*) to the section date 01-01-2020 of the *Homes Permitted On or After This Date Must Meet the Adjacent Version & Revision*, that notifies that the implementation date could be applicable as soon as it is approved.

General Comments

- The requirements and checklist documents for the Energy Star Certified Homes, refer to previous standards and codes, such as the 2009 IECC standards, 2009 IRC, other. Suggest including language to include current updated standards or all versions of standards that apply.
- Typo Error on footnote #11 of the Draft Caribbean and Pacific Rater Design Review Checklist, suggest replacing the word consistent with consist.