

From: [Thiel Butner](#)
To: [ENERGY STAR Homes](#)
Cc: [Janice Romanosky](#)
Subject: Feedback on ES ISO/IEC 17065 RFP
Date: Friday, November 16, 2018 2:42:21 PM

Hi,

I have some feedback/comments/rhetorical questions on the RFP.

Section II

I like the essence of the first paragraph.

I don't think that nonprofit status is essential. Rather, I think it's essential that VOOs not compete with the organizations they oversee, so VOOs should not have practicing raters on staff. I know that there are some nonprofits in our industry that are actively doing rating/certification work, so I firmly believe they should be disqualified from this process.

Section III, Questions

Bullet 1: Based on my limited understanding of the program, I believe that maintaining the ISO accreditation is an appropriate demonstration.

Bullet 2: Benefit: Raise the bar in terms of level of performance/service/oversight for this type of organization. Drawback: Having many organizations in this role increases the amount of possible variation in terms of implementation, though RESNET's Provider model has a similar drawback.

Bullet 3: Benefit: Based on my understanding of the ISO approach, it will offer raters constructive feedback regarding processes to help elevate the industry to a higher level of standardization. This benefit should be felt by builders (and maybe homebuyers?) that work with raters. The structure of the ISO program is very process-based, so the program itself should suggest this benefit. Another benefit may be with respect to high vs. low volume raters and how the volume/frequency of quality assurance is managed. When evaluating processes, it becomes less critical to count/document a certain number of evaluations and more impactful to evaluate the entire process/business model. I'm not sure how cost will get passed down or how long a different review system would take. Any increases in cost to the rater may be passed on to builders and then homebuyers.

Bullet 4: I don't know.

Section IV

Bullet 1: I don't know what this entails. If it requires more detailed oversight, management, and processes, I don't think it should be considered a burden. I think best practice is to maintain company records in a traceable way. If it requires substantial specific paperwork and/or additional fees, it would be a burden. We would not choose to be sub-contractors because we want to maintain our relationships with our clients directly. Additionally, multiple layers of removal from the client (as in a sub-contractor to an accredited rater) can prove problematic from an enforcement standpoint, so the less "bureaucracy" or "overhead," the better in most cases.

Bullet 2: Without knowing what accreditation entails, I don't know. However, if resources can be provided to help companies elevate their level of professionalism, it may be considered

reasonable.

Bullet 3: Benefits: I think it would improve reliability of data collection. Since ratings are an output of software programs and program interpretations (to some degree), I don't think that accreditation can guarantee more consistent ratings. Drawbacks: Many raters have longstanding relationships with their clients, so it can be very difficult to change processes or fee structures (but changes are warranted from time-to-time).

Bullet 4: I don't know.

Bullet 5: I don't know.

Section V

Maybe. Perhaps offer an open-ended section/question where organizations can present their case for consideration if they don't meet each of the requirements in the RFP.

Section VI

I'm not sure how valuable multiple registries of rated homes would be. EPA maintains a summary list of certified homes already. Rated homes are, by definition, rated through RESNET, right? So doesn't that registry suffice? If not, are multiple databases valuable to EPA and/or the industry? And does the registry report ES certification? I understand that it's a RESNET requirement for RESNET ratings, but from my perspective, it doesn't seem to add value to EPA.

Bullet 1: No comments

Bullet 2: Oh wow. Things always need to move slower than expected, even when people can supposedly see them coming. Maybe two years? It also depends on if it's "allowed" or "required." "Allowed" could be a short time frame, maybe 6 months, but "required" would have to be much longer and could be phased in with certain benchmarks that must be met.

Section VII

Bullet 1: Maybe not but there probably should be.

Bullet 2: Overall, I think it's more valuable to address training and procedural habits/shortcomings on a regular basis than the individual re-evaluation of certified homes. I appreciate that EPA is asking these questions and working to improve oversight of the ES program.

Thanks for listening,



Thiel Butner

Principal

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