

**From:** [Elizabeth Blythe](#)  
**To:** [ENERGY STAR Homes & Apartments](#); [ENERGY STAR Homes & Apartments](#)  
**Cc:** [Greg Cobb](#)  
**Subject:** Proposed new ENERGY STAR program requirements for California open through May 2  
**Date:** Tuesday, April 19, 2022 6:19:09 PM

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Hello,

Thank you very much for the presentation. On behalf of ARCXIS/EI in California, We have coordinated internally and externally and agree on the following:

- Agree with the new versions for CA (3.3 SFNH & 1.3 MFNC).
- Agree with the timeline for implementation.
- Agree with the two options for achieving the performance target.
- We do advocate against adding the updated thermal backstop in CA.

**Reason:** CA software does not perform this calculation today like in IECC states. CA has some unique construction techniques (e.g. hybrid, high performance attics) that are not easily modeled in other software to get to a total building UA value. CEC has sufficiently stringent thermal envelope requirements that the Energy Star thermal backstop is not necessary. Thus, the cost to provide accurate documentation of the national thermal backstop is will be high but any benefit would be minimal as CEC thermal envelope requirements are likely to exceed the national Energy Star thermal backstop.

- Agree with Energy Star registration via a HCO, but only if both CalCERTS and CHEERS become HCOs or operate under an HCO such as RESNET. This would allow homes to be registered with a single entity and not requiring dual registration (e.g. one for CEC code compliance and a 2<sup>nd</sup> for Energy Star HCO compliance).

Please let me know if there are any questions or concerns.

Thanks again.

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