

EPA Responses to Comments on California ENERGY STAR Qualified New Homes Guidelines, Version 3

EPA previously posted a compilation on its Web site of all comments received during the comment period for its proposed California Version 3 ENERGY STAR Qualified New Homes guidelines, which ended March 22, 2011.

This document contains a summary of these comments, along with EPA's response to each point raised and the resulting policy change, if any.

When similar comments were received from multiple respondents, EPA has consolidated these ideas into a single summary bullet. However, EPA has attempted to retain all unique comments received, including those submitted by a single respondent.

*The Environmental Protection Agency
is not responsible for any typographical errors or omissions.*

EPA Responses to California ENERGY STAR Version 3 Qualified New Homes Comments

Table of Contents

ENERGY STAR Guidelines for California3
ENERGY STAR Reference Design for California3
Inspection Checklists - General4
HVAC System QI Contractor Checklist4

EPA Responses to California ENERGY STAR Version 3 Qualified New Homes Comments

ENERGY STAR Guidelines for California

ID	Comment Summary	EPA's Response	EPA's Policy Decision
<i>ENERGY STAR Reference Design for California</i>			
1	<ul style="list-style-type: none"> One respondent noted that he would like to see a one year transition period from the onset of Version 2.5 to the start of Version 3 to allow for a better transition. 	<ul style="list-style-type: none"> The implementation timeline for California has been adjusted to allow for one full year of transition from the date of release to the implementation of Version 3. The final Version 3 guidelines will be released prior to September 30, 2011 and will be enforced for homes permitted after September 30, 2012. Version 2.5 will apply to homes permitted between January 1, 2012 and September 30, 2012. For homes permitted on or after October 1, 2012, Version 3 is required. 	<ul style="list-style-type: none"> The implementation timeline for CA has been adjusted to provide a one-year transition between the release of the final Version 3 guidelines and the implementation of these guidelines.
2	<ul style="list-style-type: none"> Another respondent noted that EPA should coordinate with software vendors to ensure that the Size Adjustment Factor (SAF) is automatically calculated to reduce errors in calculating the % improvement target. 	<ul style="list-style-type: none"> EPA is aware that the approved computer programs for use with the 2008 Building Energy Efficiency Standards do not currently include automatic calculation of the size adjustment factor, but agrees with the respondent that such automation is important. EPA will coordinate with the vendors to encourage them to automate the process, but until such time, partners will be permitted to manually calculate the Size Adjustment Factor. 	<ul style="list-style-type: none"> No policy change
3	<ul style="list-style-type: none"> One respondent recommended that the required improvement in efficiency be tied to the current California code, rather than specifically tying it to the California 2008 Building Energy Efficiency Standards. 	<ul style="list-style-type: none"> EPA intends to examine new codes as they are released in order to develop above-code program requirements that are both achievable and cost-effective. Therefore, EPA will continue to reference the 2008 Building Energy Efficiency Standards and will update the guidelines as needed upon release of revised editions of the code. 	<ul style="list-style-type: none"> No policy change
4	<ul style="list-style-type: none"> Another respondent stated that equipment manufacturers are not able to produce adequate supplies of products in response to increasingly rigorous efficiency program requirements. As a result, overall compliance costs are being driven higher than anticipated. 	<ul style="list-style-type: none"> EPA believes that the requirements proposed in the Version 3 guidelines for the state of California can be met using commercially available products. EPA recognizes that the incremental cost to participate in the program will be higher with Version 3, particularly as the new version is first implemented. However, it anticipates that the incremental cost will decrease with time. In addition, due to the voluntary nature of the program, partners are able to decide for themselves whether the incremental cost incurred is outweighed by the benefits of participation. 	<ul style="list-style-type: none"> No policy change
5	<ul style="list-style-type: none"> One respondent requested that additional builder training be provided prior to the completion of the guidelines for the State of California to ensure that partners truly understand the proposed requirements of 	<ul style="list-style-type: none"> EPA has used the same process for developing the Version 3 guidelines for the state of California that it used for the development of the national guidelines. Furthermore, the requirements proposed for the state of California are very similar to those of the national 	<ul style="list-style-type: none"> No policy change

EPA Responses to California ENERGY STAR Version 3 Qualified New Homes Comments

	Version 3.	program. Therefore, EPA believes that partners have had sufficient opportunity to evaluate the proposed guidelines and provide feedback.	
<i>Inspection Checklists - General</i>			
6	<ul style="list-style-type: none"> One respondent noted that each of the checklists should be implemented one-by-one to allow more time for partners to accommodate the added effort and expense. 	<ul style="list-style-type: none"> Because the same inspection checklists will be required in the California guidelines that are required under Version 3 of the national guidelines, EPA intends to transition partners in a similar manner. Furthermore, each of the inspection checklists are central to the value being promised for homes qualified under Version 3 of the program. For this reason, it is not practical to phase-in the inspection checklists one at a time over an extended period. 	<ul style="list-style-type: none"> No policy change
<i>HVAC System QI Contractor Checklist</i>			
7	<ul style="list-style-type: none"> Multiple respondents expressed concern about the accuracy and oversight of HVAC load calculations and equipment selection. In addition, concern was expressed about the variation in loads that may result from the use of different methodologies (e.g., ACCA Manual J versus the ASHRAE methodology that is embedded within computer programs used for demonstrating compliance with the 2008 Building Energy Efficiency Standards). Specifically, one respondent noted the disparity in equipment / appliance loads between ACCA Manual J and the 2008 Building Energy Efficiency Standards methodology. 	<ul style="list-style-type: none"> One of EPA's intents with Version 3 of the guidelines is to more clearly define the HVAC sizing and installation requirements for contractors that work on homes in the program. With that in mind, Version 3 defines acceptable methodologies for calculating the load, selecting the equipment capacity, designing the ducts, and installing the system. Acceptable methodologies include, but are not limited to, the procedures outlined in Residential Appendix RA1 – HVAC Sizing. In addition, EPA specifies certain inputs that must be used so as to increase the accuracy and consistency of load calculations. Ideally, the design and installation of HVAC systems would be completely verified by a third-party. However, in recognition of the fact that many Raters are not yet acquainted with HVAC principles, EPA has instead incorporated specific objective parameters that the Raters are required to provide oversight for. This, in combination with expanded responsibilities for the Rater regarding the duct system and ventilation system, should help ensure that homes qualified under Version 3 of the program have meaningfully more efficient HVAC systems than homes qualified under previous versions of the guidelines and homes that are not qualified. 	<ul style="list-style-type: none"> No policy change