

From: [Glickman, Joan](#)
To: [ENERGY STAR Homes & Apartments](#)
Subject: EERE/DOE Official Comments
Date: Friday, May 17, 2019 3:49:16 PM

To: ENERGY STAR Residential New Construction Team

FROM: Joan Glickman, Acting Program Manager, Residential Buildings Integration, Building Technologies Office, Office of Energy Efficiency and Renewable Energy, U.S. Department of Energy

RE: Comments on EPA's [Draft revised Verification Oversight Organization \(VOO\) Application](#)

DATE: May 17, 2019

Please take into consideration the following comments on behalf of our office. Thank you.

Proposed Change

As proposed, Section (2)(b)(i) specifies that “...*only home energy modeling software programs that are tested and approved in accordance with the most current version of RESNET Publication 002 shall be used in ENERGY STAR certifications for homes and apartments.*” We recommend expanding this section to also recognize software approved by DOE.

Recommended Language: “*Establish and maintain policies requiring that only home energy modeling software programs that are tested and approved in accordance with the most current version of RESNET Publication 002 and/or approved by the U.S. Department of Energy shall be used in ENERGY STAR certifications for homes and apartments.*”

Justification

The U.S. Department of Energy (DOE) is required to approve software (and maintain a list of such approved software) for the purposes of verifying compliance with the energy efficiency requirements for the home tax credit under section 45L of the Internal Revenue Code (§ 45L). Given this requirement, as well as DOE's expertise in energy modeling, it is appropriate to recognize DOE-approved software for certifying ENERGY STAR homes and apartments.