

EPA Responses to Comments on ENERGY STAR Certified Homes Washington Version 3.2

EPA has posted a compilation on its web site of all comments received during the comment period, which ended October 27, 2017, for its draft ENERGY STAR Certified Homes Washington Version 3.2 program requirements.

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.*

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ID	Comment Summary	EPA's Response	EPA's Policy Decision
Climate Zones			
1	<ul style="list-style-type: none"> One respondent asked why Climate Zone 4, which makes up the majority of western Washington, was not addressed in the Program Requirements. 	<ul style="list-style-type: none"> EPA's webinar on the draft Program Requirements inadvertently omitted that the requirements for Climate Zone 4C are the same as those for Climate Zone 5. However, this information was included in the draft Program Requirements made available for public comment and will also be included in the final program documents. 	<ul style="list-style-type: none"> No policy change
Window SHGC			
2	<ul style="list-style-type: none"> One respondent asked why the SHGC was reduced from a value of 0.40 in the ENERGY STAR Reference Design for the National Version 3.1 Program Requirements to 0.30 in the draft Washington Version 3.2 Program Requirements. 	<ul style="list-style-type: none"> EPA lowered the window SHGC to 0.30 to increase the savings of the ENERGY STAR Reference Design. The overall intent was to create an ENERGY STAR Reference Design that maintained meaningful savings above the code requirements in place. Additionally, because the ENERGY STAR Reference Design is configured with a window U-value of 0.27, EPA believes that a SHGC of 0.30 is achievable for this assembly. 	<ul style="list-style-type: none"> No policy change
Ducts			
3	<ul style="list-style-type: none"> One respondent asked why the duct location and leakage requirements were eased. 	<ul style="list-style-type: none"> EPA conducted outreach with partners while developing the Washington Version 3.2 Program Requirements and heard that many builders in that market were not currently placing ducts in conditioned space. EPA encourages builders to locate ducts in conditioned space, but given the relatively low adoption of this measure, it wanted to ensure that there was a compliance path available using alternative measures. Because the ENERGY STAR Reference Design does not locate ducts in conditioned space in the draft Washington Version 3.2 Program Requirements, it is necessary to define a leakage level in the ENERGY STAR Reference Design. EPA notes that partners are still permitted to use ducts in conditioned space as a means to meet the Washington Version 3.2 ENERGY STAR HERS Index Target, just as they are in the National Version 3.1 Program Requirements. 	<ul style="list-style-type: none"> No policy change