

**Comments Received During the Stakeholder Feedback Period for  
Proposed Sunset of Sampling for  
ENERGY STAR Single-Family New Homes and All Townhouses**



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

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# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

**Organization Name:** American Chemistry Council, Plastics Division

**Respondent Last Name:** Schmidt

**Respondent First Name:** Amy

## **Comments:**

### **Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses**

- 1) Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?

Yes, many homes are already being evaluated on a standalone basis. Often these are new homes that are also being evaluated for energy code compliance and being evaluated individually for those purposes.

- 2) Do you foresee any unintended consequences that may result from this policy proposal?

Nothing of significance. There may be a realization that each home, even if in the same neighborhood and built by the same builder has different performance characteristics and that the previously allowed sampling for compliance was likely misguided. Even when homes are similar in design and location there are always changes in contractors, season, timing, configuration, material swaps, etc. that can affect the performance of the individual homes. For example, simply missing the air sealing behind the tub in one home can lead to long term serious issues when not inspected and found. The sunseting of this sampling allowance will bring welcome added assurance that Energy Star Homes perform as intended.

- 3) Do you have additional general feedback on this topic?



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Please submit written comments to [energystarhomes@energystar.gov](mailto:energystarhomes@energystar.gov) no later than August 8, 2023, using this template.

Please note that all submitted comments will be posted on the ENERGY STAR website.

**Organization Name:** Energy Services Group

**Respondent Last Name:** Humphries

**Respondent First Name:** Matthew

**Comments:**

## Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses

- 1) Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?

We don't do sampling, so you can stop it today if you'd like.

- 2) Do you foresee any unintended consequences that may result from this policy proposal?

Yes. Energy Star may not 'foresee' that this will impact the cheaters who do sampling and not really inspect houses. They will have to produce results to provide to QAD for 10%+ Review. This will cause some of these 'fake raters' to fade away when they can no longer fake ratings from the comfort of their office.

- 4) Do you have additional general feedback on this topic?

This needs to be gone yesterday. In a world where we are taking 40 pictures, verifying equipment calibrations, % of jobs paperwork reviewed and another % field reviewed, going through checks and balances on HVAC paperwork, performing checkups on HVAC equipment (that HVAC contractors should be doing, not us), Why on EARTH, would you allow this sampling procedure to continue as long as it has? It goes against everything that we set out to do as Energy Professionals. What's next, 'sample auditing' on the existing homes market? Maybe we just start phoning in audits, ask the customer 'how the house feels to them' and just take their word on it, and not prove anything with Science? Not only are the rules for sampling so unclear, vague, and over complicated, it allows for huge gray areas of what's acceptable when your rules aren't clearly defined and easily understood. Sampling goes against everything that makes a rater a reliable source to the builder, proving our science by field performing evaluations and assessments on the home in question. What did sampling do, besides take averages and assumptions, and allow bad actors to participate in Energy Star, cheating the system by outputting a lower quality product (rating) at an uncompetitive price to those who actually perform physical work? If a builder knows their rater is sampling, do those builders even bother doing things like weatherstrip and birdscreens? I mean, the rater will never actually see it, so why bother doing it? Now extrapolate that example by the larger, more important items: Like proper mastic/sealing duct work. Air sealing the framing. Mechanical fan operation. How do you explain to a buyer of a home that they are Energy Star but were sampled. ***"Gee Mr.Customer, I'm sorry your having this issue. See, even though your energy star, we allow our rater to sample all our homes, so he never really stepped foot in your house, or any of the houses on this block for that matter, to inspect it. Yet, we assigned it an Energy Star rating."***

To those decision makers reading this: Would you buy a car, knowing it left the manufacturing plant, receiving zero safety inspections. It was 'sampled' because a different car, 30 cars in line before this one, passed all its safety



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inspections. So there's no need to safety inspect your car, because they did one safety inspection on a different car last week.



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

## *Comment Submitted via Email:*

From: Kelly Parker  
Sent: Tuesday, July 11, 2023 1:29 PM  
To: energystarhomes@energystar.gov  
Subject: Sunset of sampling

My name is Kelly Parker and I was on the RESNET Standards Board and helped write the sampling standards over two decades ago.

I support the elimination of the sampling protocol. Codes have now caught up in most states to where you must have an individual address to inspect for meeting energy codes.

Frankly there's just too much to inspect now and the labor market has tightened and few contractors now have quality control programs in place to handle the workload.

I support the elimination of sampling.

Kelly Parker PE  
GWS  
A national RESNET provider

Sent from my iPhone



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

***Comment Submitted in Letter. See Next Two Pages:***

August 2, 2023

Environmental Protection Agency 1200  
Pennsylvania Avenue, N.W. Office of Air and  
Radiation, 6201A Washington, DC 20460

Submitted electronically: [energystarhomes@energystar.gov](mailto:energystarhomes@energystar.gov)

Dear ENERGY STAR team:

On behalf of Home Innovation Research Labs, I am pleased to submit comments on *ENERGY STAR's Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses*. We support EPA's decision to end the acceptance of sampling in lieu of individual inspections of homes.

## **General Feedback**

EPA's decision to sunset sampling of single-family homes supports consistency in the marketplace. We believe this change will help eliminate confusion among the verifier and builder communities and offer greater transparency and quality assurance to home buyers and renters. Given ENERGY STAR's leadership and strong market presence, many building professionals look to EPA for procedural and policy guidance that they then apply to other energy ratings and certifications. ENERGY STAR is also recognized as an energy efficiency compliance option in many green building programs, many of which accept no or very limited sampling of single-family homes.

This change will also help ensure that federal incentives for energy efficiency are extended only to compliant buildings, which imbues greater consumer reliance on energy efficiency and green building certification programs.

## **Home Innovation Research Labs Overview**

Home Innovation Research Labs serves as certification agency and provides a certificate of conformance to residentially used buildings meeting the requirements of the **ICC-700 National Green Building Standard (NGBS)**.

Home Innovation Labs is a 59-year-old, internationally recognized, accredited product testing and certification laboratory located in Upper Marlboro, Maryland. Our work is focused on the residential construction industry, and our mission is to improve the affordability, performance, and durability of housing by helping overcome barriers to innovation. Our core competency is as an independent, third-party product testing and certification lab, making us uniquely suited to provide green certification services for residential buildings. Our staff is comprised of mechanical, structural, and electrical engineers; planners; economists; architects; builders, remodelers, and contractors; lab and technicians.

While their expertise is rooted in building science and applied research, they are also steeped in third-party certification practice and work with clients regularly to assist them in conveying information to clients in a transparent, reliable, and straightforward manner.

## **Summary**

Thank you for the opportunity to provide input on EPA's sunset of sampling for single-family homes. Please do not



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hesitate to contact Michelle Foster, our Vice President of Sustainability, at [mfoster@homeinnovation.com](mailto:mfoster@homeinnovation.com) or 301-430-6205, directly if she can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Michael Luzier". The signature is fluid and cursive.

Michael Luzier President & CEO





# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

**Organization Name:** JKP Energy Inspections

**Respondent Last Name:** Johnson

**Respondent First Name:** Katie

## **Comments:**

### **Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses**

- 1) [Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?](#)

We do not see any problem with the timeline. We foresee some builders starting to switch prior so it will not be all at once. Also, because it is based on permit date it will not be a rapid transition.

- 2) [Do you foresee any unintended consequences that may result from this policy proposal?](#)

Communication with superintendents has always been an issue even with sampling, so with 100% testing if these communication issues continue it will result in missed/uncertified homes.

Townhomes have had issues passing blower door inspections because of the restrictions from fire code on air sealing party walls. For homes that have 2 party walls, there could be a real struggle to get them to pass.

There will be a need for increased staff. Finding qualified candidates to become RFIs is already difficult enough and with increasing the number of inspections by 7 is going to require significant staffing. This will lead to a substantial increase in payroll prior to increased workload which will be a strain.

- 3) [Do you have additional general feedback on this topic?](#)

It is known that Arizona has been behind the curve with being the only state still using sampling. We knew that this change was coming but we are very much in support of this change. But this will lead to a rough patch with builders having to change their processes and holding up closings in the case of a failing item. Overall, we believe this is a positive change, but it will be a lot of upfront work in the beginning.



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

**Organization Name:** Leading Builders of America (LBA)

**Respondent Last Name:** Hickman

**Respondent First Name:** Amanda

**Comments:**

## Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses

- 1) [Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?](#)

The timing of the proposed sunset is concerning. Sampling is currently essential in regions with high-volume production that lack a sufficient number of qualified raters for testing. Furthermore, the potential disconnects between the program's move away from sampling and the current allowance of sampling in other related programs, such as Zero Energy Ready Homes (ZERH) and Indoor airPLUS (IAP), could lead to confusion among builders and industry stakeholders. Addressing this inconsistency would maintain clarity and uniformity across all related programs. Additionally, many builders may find navigating both the transition to ENERGY STAR 3.2 and the elimination of sampling protocols overwhelming and difficult. A transitional period that allows builders to acclimate to the changes of 3.2 before completely phasing out sampling would help to ensure continued builder participation in the program.

- 2) [Do you foresee any unintended consequences that may result from this policy proposal?](#)

Leading Builders of America (LBA) is a long-standing and strong supporter and advocate of the ENERGY STAR® program. Offering valuable market differentiation, many of our esteemed members build ENERGY STAR certified homes and some build exclusively to the program. Collectively, LBA members constructed more than half of the total number of homes submitted to the program in 2022 according to the Residential Energy Services Network (RESNET).

This proposal necessitates the creation of an alternative compliance pathway in cases where a pre-drywall inspection is missed. Although these instances are infrequent, miscoordination of pre-drywall inspections meant to verify insulation and air sealing levels creates significant challenges for builders. This is especially the case for builders who have established a brand promise of exclusively constructing ENERGY STAR homes. These builders have not only made promises to the EPA but also to their customers about building 100% ENERGY STAR homes. Currently, the only option provided by the EPA involves tearing out drywall and trucking a large quantity of materials to landfills. A more tenable, less wasteful cure is necessary, prudent, and aligns with the program's stated goal of responsible environmental stewardship including the reduction of harmful greenhouse gas emissions.

- 3) [Do you have additional general feedback on this topic?](#)

While we support the EPA's desire for greater assurance that all program requirements are met, we must also find sensible solutions in cases when inspections are missed. This will make the program more tenable, especially for new builders and for those looking to increase their commitment to ENERGY STAR. There are several approaches available involving certified third parties and advanced technologies for verification. We would like to discuss Quality Assurance/Quality Control protocols that can be coordinated with Home Certification Organizations in a follow up meeting with you. By working together on this important issue, we can minimize costs and waste while enhancing



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the reliability of field verification and testing.

LBA remains dedicated to collaborating closely with the EPA to explore and implement effective strategies that promote ENERGY STAR homes while minimizing environmental impact by reducing carbon and greenhouse gas emissions. By embracing innovation and sustainability, we can collectively work towards a greener and more eco-conscious future.

Thank you for considering our comments and suggestions. We appreciate the opportunity to contribute to the ongoing development and improvement of the ENERGY STAR program.



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

**Organization Name:** MaGrann Associates

**Respondent Last Name:** Adams

**Respondent First Name:** Ben

**Comments:**

## Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses

- 1) Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?

Yes.

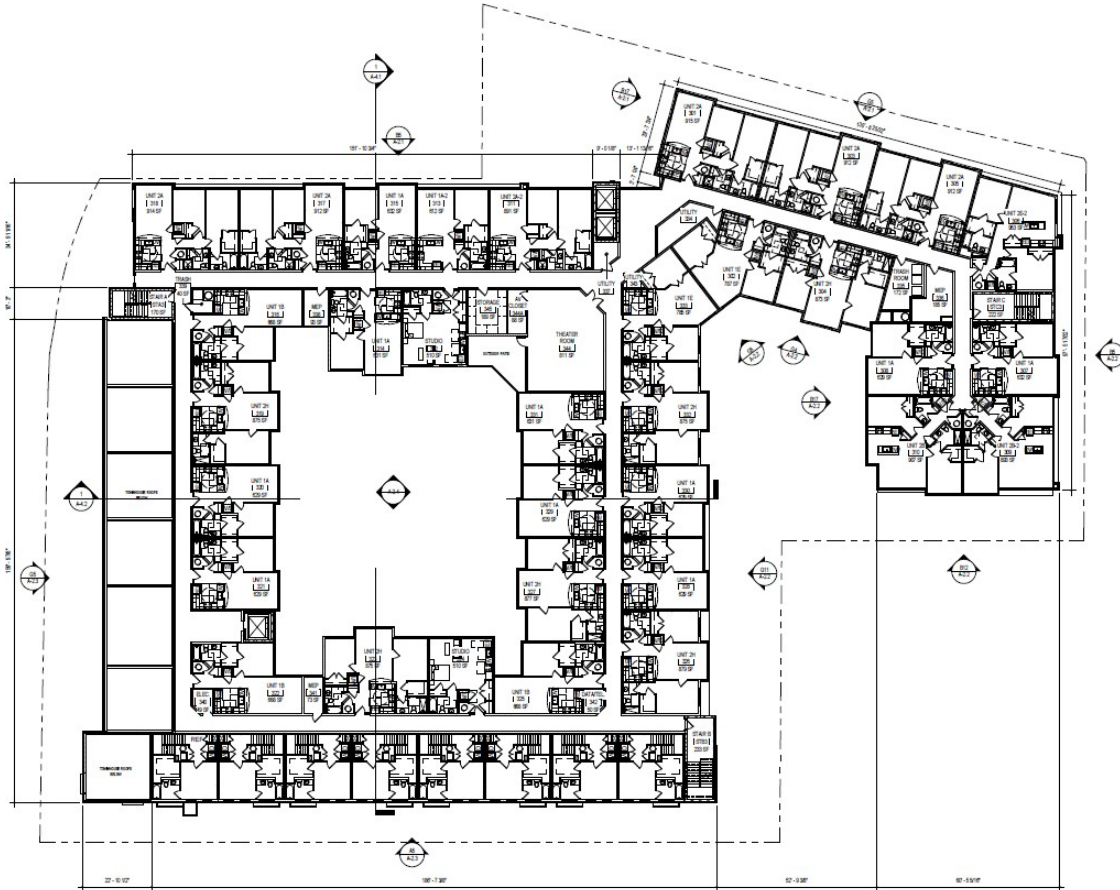
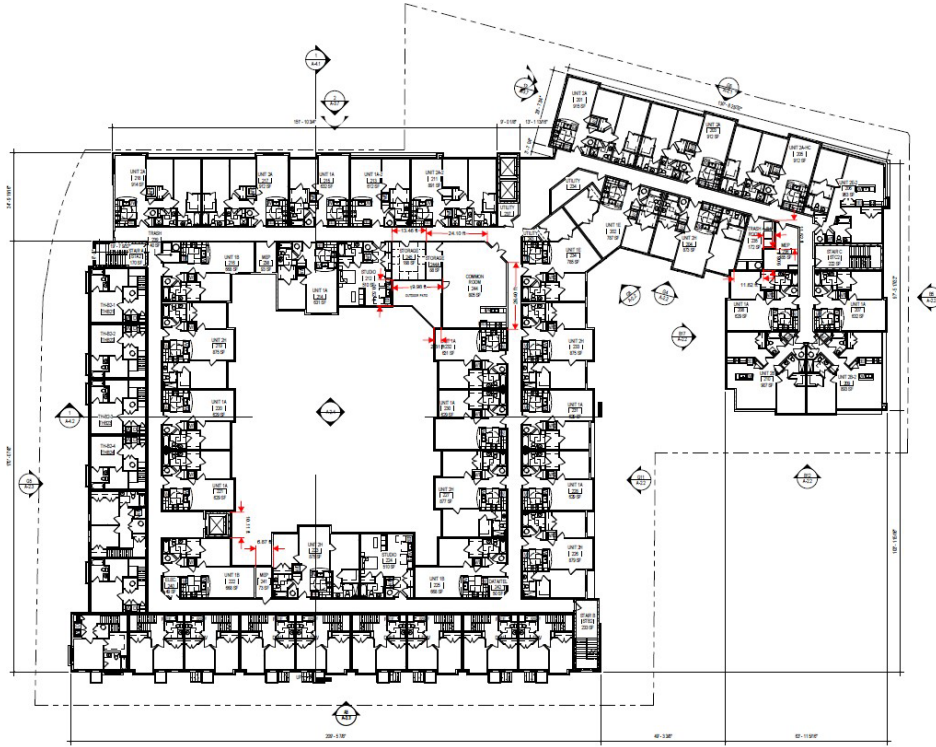
- 2) Do you foresee any unintended consequences that may result from this policy proposal?

We suggest EPA provide specific guidance regarding sampling applicability to structures that include a “multifamily building” with one or more “townhome” units *attached to the same structure*. We suggest EPA take the same approach as LEED which considers the combined configuration to be one building. This scenario would therefore be subject to the MF exemption allowing sampling. Townhomes in the same development that are not attached to a multifamily structure would not be eligible for sampling.

An example of this configuration is the one below in Brentwood, MD comprising “Studios, 1, & 2 Bedroom Apartments & 3 Bedroom Townhomes” (Note units defined as townhomes attached on west side):



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A8 THIRD FLOOR PLAN  
TIP-102



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## 3) [Do you have additional general feedback on this topic?](#)

MaGrann is in support of this change, which we believe will be important especially for the new entrants to ENERGY STAR Certified Homes and MFNC who will likely be encouraged by the direct linkage of 45L eligibility criteria to ENERGY STAR certification.



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

**Organization Name:** Northeast Home Energy Rating System Alliance

**Respondent Last Name:** Zeis

**Respondent First Name:** Cindy

**Comments:**

## Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses

- 1) Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?

This time appears to be reasonable

- 2) Do you foresee any unintended consequences that may result from this policy proposal?

Sampling of townhomes may be included as defined by the MFNC standards. When certified under the SFNH program, sampling should follow the sampling protocols in place for SFNHs at the time of permitting.

- 3) Do you have additional general feedback on this topic?

Sampling should be limited to controls to be sampled to performance testing to include infiltration, duct and ventilation. This still allows for rewarding of good behavior/installations while allowing inspection processes to be streamlined and still beneficial to the stakeholders.



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

**Organization Name:** SK Collaborative

**Respondent Last Name:** Seville

**Respondent First Name:** Carl

## **Comments:**

### **Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses**

- 1) Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?

Unsure

- 2) Do you foresee any unintended consequences that may result from this policy proposal?

As the IRA is providing significant incentives for ENERGY STAR Certification, I believe that sampling is valuable for large single family for sale and build to rent developments and will encourage developers to use the program. If 100% inspections and testing are required, I expect that fewer projects will seek the certification.

- 3) Do you have additional general feedback on this topic?

No





# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses

## Comments Received

**Organization Name:** Strand AE

**Respondent Last Name:** Wall

**Respondent First Name:** Brent

### Comments:

#### Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses

- 1) [Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?](#)

I understand the proposal to stop using sampling for homes permitted on or after January 1, 2025. However, I'm concerned about the suggested timeline and the decision to eliminate sampling completely. The new ESTAR v3.2 program, with additional testing like ACCA 310 (still in its infancy regarding field inspections and results), will likely encounter both expected and unexpected challenges. I don't think the time frame allows partners enough time to prepare and switch to individual home inspections. Moreover, I'm unsure why we must do away with sampling altogether. It's a valuable tool that proves beneficial for anyone in this industry.

Given the complexity of ESTAR V3.2, it is crucial to consider the challenges and potential disruptions it may cause to our partners' operations. Rushing into this decision without allowing for more extensive preparation and collaboration could lead to unintended consequences and difficulties in maintaining compliance.

- 2) [Do you foresee any unintended consequences that may result from this policy proposal?](#)

Given the specific context of the Texas market, potential changes to architectural, engineering, and floor system aspects are likely to add complexity to the process. The unique requirements and regulations in this region may necessitate careful consideration and adjustments to ensure smooth implementation and successful project completion.

- 3) [Do you have additional general feedback on this topic?](#)

Going "cold turkey" on sampling without thoroughly evaluating its potential benefits and drawbacks might not be the most prudent approach. Instead, conducting a comprehensive evaluation of the sampling method and exploring if further improvements can lead to a better outcome would be wise.

When implemented thoughtfully, sampling can offer valuable insights and efficiency gains in the inspection process. By analyzing the data collected through sampling, we can identify patterns and trends that might not be apparent through individual inspections alone. This data-driven approach can help identify problem areas and direct resources more effectively. Moreover, a gradual transition towards a revised sampling approach, rather than an abrupt cessation, can provide a smoother path for partners to adapt to the changes. It allows time for necessary adjustments, staff training, and the development of improved sampling protocols to ensure the best possible outcomes.

Furthermore, through open communication and collaboration with stakeholders, we can gather feedback and insights from those who are directly involved in the inspection process. This will provide a well-rounded understanding of the strengths and weaknesses of both individual inspections and sampling.

In conclusion, taking the time to evaluate and potentially enhance the sampling method is a more balanced and



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responsible approach. It allows us to make informed decisions based on empirical evidence and fosters continuous improvement to achieve our goals effectively. Rushing into a complete sunset of sampling without considering its potential benefits might lead to missed opportunities for a more efficient and productive inspection process.



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses

## Comments Received

**Organization Name:** Steven Winter Associates

**Respondent Last Name:** Andracchio

**Respondent First Name:** Joseph

**Comments:**

**Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses**

- 1) Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?  
yes
- 2) Do you foresee any unintended consequences that may result from this policy proposal?  
Fee increases and challenges finding qualified raters to perform additional work
- 3) Do you have additional general feedback on this topic?  
Consider allowing townhomes to continue sampling as they are completed with a similar sequencing to multifamily with the same crews working on the same phase across multiple units. Please see below for further information.

Steven Winter Associates has proven that there is not a large difference in tested values when testing multiple townhomes within one project. When there is a project consisting of multiple townhomes, each home is often constructed within the same time frame, by the same crew, and within the same environmental conditions. Townhomes are often part of larger projects containing apartment buildings as well. We have found only a small variation in tested values of infiltration, duct leakage and ventilation in townhomes. The test results of four different townhome projects, Holly Creek Phase I, Phase I, 210 Hancock, and 11 Crown, show consistency in test results when tested through RESNET’s sampling protocols. Testing every townhome individually will be a large added cost to projects consisting of more than 7 townhomes and will provide unnecessary additional quality assurance.

Holly Creek Phase I in Ithaca is a project consisting of 11 townhomes (two quad buildings and one triplex). Below are the tested values for air infiltration for 8 of the 11 units in CFM50. As you can see, the range in CFM50/SF of enclosure is 0.10 – 0.15, not showing a large variation.

Holly Creek Phase I Test Results				
Unit	# BR	Blower Door Result (CFM50)	CFA (ft^2)	CFM50/SF of enclosure
127	3BR	401	1340	0.13
109	2 BR	428	1160	0.14
103	3BR	328	1340	0.10
115	3BR	450	1340	0.14
125	2 BR	454	1160	0.15
105	2 BR	410	1160	0.14
111	3BR	436	1340	0.14
117	2 BR	387	1160	0.13
Range				<b>0.10 - 0.15</b>

Holly Creek Phase II had similar consistency with test results. Phase II also consisted of 11 townhomes (two quad



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buildings and one triplex). This project was constructed two years later by a different crew. The range of the eight tested homes in this project for CFM50/SF of enclosure is 0.18 – 0.20. The apartments in this building shared consistency in test results with other units within the project, but varied greatly in relation to Holly Creek Phase I. This proves that crews build consistently on one project.

Holly Creek Phase II Test Results				
Unit	# BR	Blower Door Result (CFM50)	CFA (ft <sup>2</sup> )	CFM50/SF of enclosure
141	2	635	1182	0.20
143	2	655	1392	0.19
145	2	600	1182	0.19
147	2	650	1392	0.19
151	2	640	1392	0.18
153	2	620	1182	0.20
155	2	670	1392	0.19
157	2	640	1182	0.20
Range				<b>0.18 - 0.20</b>

210 Hancock Street is a project located in Ithaca, NY consisting of one building containing 50 apartments and three buildings containing 12 attached townhomes. Below are the results of infiltration testing and exhaust testing of the townhomes only. Again, results for infiltration insignificantly vary by 0.5 CFM/SF of enclosure. Kitchen and bath fans show a higher variation in test results, 39 CFM and 21 CFM respectively, although all are passing results.

210 Hancock Street Test Results						
Unit	# BR	Blower Door Result (CFM50)	CFA (ft <sup>2</sup> )	CFM50/SF of enclosure	Kitchen Fan Test Results (CFM)	Bath Fan Test Results (CFM)
D204	3	715	1276	0.28	125	44
D206	2	769	1073	0.30	126	39
D208	3	703	1276	0.24	145	37
C406	2	735	1073	0.28	114	46
C408	2	766	1073	0.30	143	44
C410	2	702	1073	0.27	106	42
C412	2	776	1073	0.30	130	47
B428	3	1035	1194	0.30	131	27
B426	3	812	1347	0.27	123	33
B424	3	805	1347	0.26	110	25
B422	3	898	1347	0.29	115	32
B420	3	772	1347	0.25	108	57
Range				<b>0.25 - 0.30</b>	<b>106 - 145</b>	<b>25 - 46</b>

The fourth townhome project, 11 Crown, contains two buildings with 18 townhomes and two buildings with 63 apartments. This project achieved a PHIUS certification. The 18 townhomes were tested on a sampled basis, but the overall buildings each had to meet passive house whole building air infiltration requirements. Below are the test



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results for compartmentalization air infiltration testing, duct leakage testing and ventilation testing of the townhomes, which show consistency across the units.

11 Crown Test Results										
Unit	# BR	Blower Door Result (CFM50)	CFA (ft^2)	CFM50/SF of enclosure	Total Duct Leakage (CFM25)	Duct Leakage to Outside (CFM25)	Kitchen Fan Test Results (CFM)	Bath Fan 1 Test Results (CFM)	Bath Fan 2 Test Results (CFM)	Bath Fan 3 Test Results (CFM)
11	3	472	1729	0.10	89.00	10.00	26	20	20	19
18	3		1729	0.00			26	21	21	20
12	3	1375	1689	0.29			25	20	19	20
13	3		1689	0.00			26	21	20	22
14	3		1689	0.00			23	20	21	20
15	3		1689	0.00			25	18	20	18
16	3		1689	0.00			26	20	21	20
17	3	441	1689	0.09	84.00	11.00	25	21	20	19
1	3	468	1651	0.10	75.00	0.00				
10	3	474	1651	0.10						
2	3	651	1607	0.14	67.00	10.00				
3	3	762	1607	0.17	85.00	10.00				
4	3	866	1607	0.19	65.00	10.00	25	22	23	21
5	3		1607	0.00			28	21	22	20
6	3	971	1607	0.21	86.00	10.00	30	23	20	21
7	3	958	1607	0.21	65.00	11.00	25	22	23	20
8	3	928	1607	0.20	94.00	20.00	26	25	23	20
9	3	913	1607	0.20	75.00	11.00				
Range				<b>0.10 - 0.21</b>	<b>65 - 94</b>	<b>0 - 20</b>	<b>25 - 30</b>	<b>18 - 25</b>	<b>19 - 23</b>	<b>18 - 22</b>

Townhomes are more like apartments than they are like duplexes and single-family homes. The townhome projects that SWA has worked on are often part of a larger development which includes apartment complexes as well.

These dwelling units are all built by the same crew, within the same time frame, and result in similar performance results. Whereas eliminating sampling for single family homes and duplex's is logical since the crew that builds one home often varies greatly from the crew that builds the next, separating sampling protocols from townhomes and apartments will create added complexity to these projects without creating higher quality work.



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

**Organization Name:** Tacoma Energy

**Respondent Last Name:** Johnson

**Respondent First Name:** John

**Comments:**

## Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses

- 1) Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?

I feel that the sampling of single family and townhomes should end today! We made a company to stop sampling and have had no ill effects.

- 2) Do you foresee any unintended consequences that may result from this policy proposal?

No

- 3) Do you have additional general feedback on this topic?

With the change in the ENERGY STAR® program due to the inflation reduction act signed into law, I firmly believe that we as an industry need to raise the bar to protect the tax payer dollars and truly impact energy savings, energy reduction and home affordability.



# Proposed Sunset of Sampling for ENERGY STAR Single-Family New Homes and All Townhouses Comments Received

**Organization Name:** Wave Crest Enterprises Inc. DBA Alliance Green Builders

**Respondent Last Name:** Williams

**Respondent First Name:** Richard

## **Comments:**

### **Proposal to Sunset Sampling for Single-Family New Homes and All Townhouses**

- 1) Will the proposal to sunset the use of sampling for homes permitted on or after January 1, 2025 provide sufficient time for partners to prepare to individually inspect homes?

I believe so. In fact I don't see how they could not be ready, unless the sampling has purposely missed homes that would not pass.

- 2) Do you foresee any unintended consequences that may result from this policy proposal?

No, I see only positive outcomes

- 3) Do you have additional general feedback on this topic?

I believe that there has been a lot of cheating going on with the sampling process, so applaud that sampling is being ended. Some rating companies have had their feet held over the fire by some builders, with builders threatening to find another rater if the current rater does not pass their sampling units. The cheating that is taking place is common knowledge in the industry. With sampling ending the cheating will also hopefully end. Time will tell, but something did have to change.