

# **EPA Responses to Comments on Florida 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 Florida Version 3 ENERGY STAR Qualified New Homes guidelines, which ended May 27, 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.*

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**ENERGY STAR Guidelines for Florida**

ID	Comment Summary	EPA's Response	EPA's Policy Decision
<b>ENERGY STAR Reference Design for Florida</b>			
1	<ul style="list-style-type: none"> <li>One respondent has suggested allowing AC units with electric resistance heating strips instead of heat pumps when complying under the Prescriptive Path, as the heating requirements in south Florida are minimal.</li> </ul>	<ul style="list-style-type: none"> <li>Under Version 2 of the prescriptive regional guidelines for Florida, options for electric resistance heating systems were not included. EPA's intent is that this policy will remain unchanged for Version 3. Note, however, that a home using electric resistance heating is permitted to be built using the Performance Path, as long as it meets the required HERS Index Target.</li> </ul>	<ul style="list-style-type: none"> <li>No policy change</li> </ul>
2	<ul style="list-style-type: none"> <li>Another respondent has requested an estimate of the ENERGY STAR HERS Index target for homes that are qualified under the draft Version 3 guidelines for Florida to ensure that builders are ready for the updates.</li> </ul>	<ul style="list-style-type: none"> <li>The proposed 2010 Florida Building Code consistently produces HERS Indices in the mid to low 80s, whereas the draft Florida Version 3 guidelines have HERS Indices in the low 70s and high 60s. However, the HERS index target for any specific home will be dependent on the architectural features, the climate zone, and the conditioned floor area relative to the size of the Benchmark Home.</li> </ul>	<ul style="list-style-type: none"> <li>No policy change</li> </ul>
3	<ul style="list-style-type: none"> <li>One respondent has requested that each requirement in Version 3 that was not included in Version 2 be presented to stakeholders in an easily understandable and quantifiable method as numerous requirements have been added and need to be justified.</li> </ul>	<ul style="list-style-type: none"> <li>The inspection checklists proposed for use in Florida under Version 3 of the program are identical to those of the national program. EPA has prepared a document estimating the energy savings and incremental costs associated with these inspection checklists, which is available at: <a href="http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/EstimatedCostandSavings.pdf">http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/EstimatedCostandSavings.pdf</a>. Florida-specific changes to the core energy efficiency components of the guidelines were presented in the Florida stakeholder webinar held in May and are available at: <a href="http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/ES_V3_Florida_Guidelines.pdf">http://www.energystar.gov/ia/partners/bldrs_lenders_raters/downloads/ES_V3_Florida_Guidelines.pdf</a></li> </ul>	<ul style="list-style-type: none"> <li>No policy change</li> </ul>

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4	<ul style="list-style-type: none"> <li>Another respondent has noted that the 2009 IECC has a compliance path option, the simulated performance alternative in Section 405, which does not credit equipment efficiency improvements. In contrast, the respondent noted, the Florida Energy Code does provide credit for equipment efficiency improvements. Therefore, the respondent questioned whether the ENERGY STAR Version 3 program requirements for Florida will credit these equipment efficiency improvements when determining compliance.</li> </ul>	<ul style="list-style-type: none"> <li>When following the Performance Path, upgrades to the efficiency of equipment (e.g., air conditioner, heat pump, furnace, water heater) are captured in the HERS index of the rated home and can be used to meet the required HERS Index Target.</li> </ul>	<ul style="list-style-type: none"> <li>No policy change</li> </ul>
<p><b><i>HVAC System QI Contractor Checklist</i></b></p>			
5	<ul style="list-style-type: none"> <li>One respondent has noted that EnergyGauge has the ability to calculate block loads in a manner consistent with Manual J and is already permitted to be used to calculate loads in compliance with Florida state code. The respondent has asked whether EnergyGauge can also be used to complete Manual J calculations for the purpose of meeting Item 2.1 of the HVAC System Quality Installation Contractor Checklist.</li> </ul>	<ul style="list-style-type: none"> <li>While ACCA has approved EnergyGauge for use in completing Manual J calculations, EnergyGauge does not include the ability to complete room-level design loads that are necessary to complete a duct design that is consistent with the intent of ACCA Manual D, per Item 2.2 of the checklist. Therefore, additional design software would be needed to complete the HVAC design in order to meet the intent of this item. Note that it is the contractor, rather than the rater, who is responsible for completing the HVAC design. The rater would not be required to purchase new software to meet the HVAC System Quality Installation Rater Checklist for Version 3.</li> </ul>	<ul style="list-style-type: none"> <li>No policy change</li> </ul>
6	<ul style="list-style-type: none"> <li>Another respondent has suggested removing the air balancing requirements in Section 10 of the HVAC System QI Contractor Checklist, in light of the fact that the system must be designed in compliance with ACCA manuals and that static pressure and total duct leakage will be measured. The respondent stated that also requiring balancing will add unnecessary costs and frustration.</li> </ul>	<ul style="list-style-type: none"> <li>The air balancing requirements of Section 10 are based upon the industry-standard ACCA/ANSI 5 QI-2007 protocol and are also a requirement of the national program. Static pressure and total duct leakage testing are useful indicators of overall duct performance. However, the balancing requirements will add value by helping to ensure that the room-level design airflows selected by the HVAC contractor are actually achieved in the field. HVAC run-time can be increased in homes where the delivered air flow is not consistent with the design airflow, compromising both the comfort of the occupant and the efficiency of the home.</li> </ul>	<ul style="list-style-type: none"> <li>No policy change</li> </ul>