



National Association of State Energy Officials

June 13, 2019

To: Jon Passe, U.S. Environmental Protection Agency, Chief, ENERGY STAR Residential Branch
From: The National Association of State Energy Officials
RE: Proposed changes to EPA Recognition of Verification Oversight Organizations

Thank you for this opportunity to comment on the U.S. Environmental Protection Agency’s proposed changes to the “EPA RECOGNITION OF VERIFICATION OVERSIGHT ORGANIZATIONS” document. The National Association of State Energy Officials (NASEO) is the only national non-profit representing the 56 Governor-designated State and Territory Energy Office Directors and their more than 3,000 staff.

State and Territory Energy Offices across the United States maintain an interest in encouraging greater consistency of Energy Rating Index (ERI) scores produced by raters and verifiers such as those participating in the ENERGY STAR certification for homes and apartments program, as well as for building energy code compliance. For the last two years, NASEO and several of our members have worked to increase the consistency of energy scores through a partnership with the National Renewable Energy Laboratory and the private sector vendors of software used to generate ERI scores. This work, supported through a U.S. Department of Energy State Energy Program grant led by the Rhode Island Department of Energy Resources, has sought to “harmonize” energy modeling and eliminate one source of variability in ERI scores - the energy model. To achieve this, a group of stakeholders convened to update the U.S. Department of Energy’s, Energy Plus energy modeling engine to allow it to generate ERI scores¹. As a result of this two-year effort, the 9.1.0 version of Energy Plus was released in March 2019 with a “beta”² capability for generating ERI scores. A full “1.0” version release is expected in the fall of 2019.

NASEO and its members recommend that EPA provide an additional pathway for compliance for Verification Oversight Organizations by allowing use of software that is accredited by the U.S. Department of Energy, such as those using the Energy Plus modeling engine, in addition to energy modeling software programs that are accredited by RESNET.

Therefore, NASEO suggests the following change to the “EPA RECOGNITION OF VERIFICATION OVERSIGHT ORGANIZATIONS” document:

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Current Language

Section (2)(b)(i) “*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 shall be used in ENERGY STAR certifications for homes and apartments.*”

Recommended language

Section (2)(b)(i) “*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.*”

By approving this change, U.S. EPA will allow vendors to take advantage of open source energy modeling software such as the National Renewable Energy Laboratory’s Energy Plus energy model, reduce variability of energy ratings caused by different energy models, and allow additional market actors to provide software solutions to Verification Oversight Organizations.

Finally, this change will support an additional goal of state energy offices- increasing the availability of comparable information on the energy use of the residential building stock in the United States. This is because the U.S. DOE’s Home Energy Score is expected to begin using the Energy Plus energy modeling engine in the next 12 to 18 months. As Home Energy Score is increasingly utilized to score existing homes, home buyers and tenants will have increasing access to comparable information produced by both scoring systems, such as energy cost per year or MMBtu per year. The recommended change would provide residential housing market participants with consistent information based on the same energy model, eliminating one important source of inconsistency.

Thank you for the opportunity to comment on this topic.

Best regards,



David Terry
Executive Director, NASEO

ⁱ Energy Plus will also become the energy modeling engine for the U.S. Department of Energy’s Home Energy Score.

ⁱⁱ Beta versions are a form of a new product or new software that is given to people to test before it is sold to the public. Macmillian Dictionary. <https://www.macmillandictionary.com/us/dictionary/american/beta-version>. Accessed June 12, 2019.