



# ENERGY STAR Program Requirements for California, SFNH Version 3.3 / MFNC Version 1.3 and Extension of HCO Oversight Stakeholder Comment Form

Please submit written comments to [energystarhomes@energystar.gov](mailto:energystarhomes@energystar.gov) no later than May 2, 2022, using this template. Please note that all submitted comments will be posted on the ENERGY STAR website.

**Organization Name:** NRDC (Natural Resources Defense Council)

**Respondent Last Name:** Urbanek

**Respondent First Name:** Lauren

**Comments:**

## Definition of California SFNH Version 3.3 and MFNC Version 1.3 Program Requirements

- 1) Do you have feedback on the proposed new performance targets of the ENERGY STAR Single-Family New Homes (SFNH) and Multifamily New Construction (MFNC) Program Requirements for California (i.e., an Efficiency EDR  $\geq 3$  points, or a Compliance Margin  $\geq 10\%$ , above the 2019 Building Energy Efficiency Standards)?

Given the latest updates to the 2022 California Title 24 energy code, the ENERGY STAR California SFNH Version 3.3 and MFNC Version 1.3 should require all-electric new construction. The 2022 California code already strongly encourages electrification of single family and multifamily homes by setting a performance standard with a baseline of electric space or water heating, the larger of the two in most climate zones. Combined with the updated source energy metric, this already creates a strong incentive for builders to go all-electric when following the 2022 code. While all-electric construction is not required, it is a relatively easy lift in California given the updated baseline. ENERGY STAR should set a clear direction for new construction to be both efficient and all-electric. A home that meets the proposed ENERGY STAR requirements but uses fossil fuels would be a step backwards from the 2022 California code.

- 2) Because the California code compliance software does not calculate total UA values, which are used to define the backstop in the national program requirements, and enforcing the backstop in California may not provide significant value due to the rigor of the efficiency requirements, EPA is proposing to exempt homes/apartments certified in California from demonstrating compliance with the thermal backstop. Is this a reasonable exemption? If not, what approach might EPA take to enforce this requirement, given the lack of an existing software mechanism and the challenges of creating/maintaining a California-specific calculator?

We do not have feedback on this section.

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

[Add comments]

## Extension of the Home Certification Organization (HCO) Construct to California

- 1) Is being certified through a Home Certification Organization (HCO) an appropriate requirement for homes and apartments certified in California?

We would like to ensure an appropriate level of stringency when being certified through a HCO. Quality control protocols should be in place and be at least as stringent as the current procedure.

- 2) Are the modifications to the *ENERGY STAR Certification System* and *ENERGY STAR Certification Protocol* appropriately written and/or are additional adjustments necessary to make these documents applicable to California?

We do not have feedback on this section.

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

[Add comments]