



# ENERGY STAR Residential New Construction Roadmap Stakeholder Comment Form

Please submit written comments to [energystarhomes@energystar.gov](mailto:energystarhomes@energystar.gov) no later than November 15, 2021 using this template. Please note that all submitted comments will be posted on the ENERGY STAR website.

**Organization Name:** NEHERS

**Respondent Last Name:** DeVico

**Respondent First Name:** Sara

**Comments:**

## General

These comments are submitted on behalf of the Northeast Home Energy Rating Services Alliance, which represents more than 175 Raters and 9 Providers from New Jersey to Maine.

### National Transition to SFNH v3.1/MFNC v1.1

- 1) Are there any available data or analyses to indicate that a national transition to SFNH Version 3.1 and MFNC Version 1.1 is not warranted at this time?

[Add comments]

- 2) Will the proposed date of January 1, 2023 (based on permit date) provide partners with sufficient time to prepare for the transition to SFNH Version 3.1 and MFNC Version 1.1?

Yes, the proposed timeline is sufficient

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

Given the available data presented by EPA regarding current scores, we support this transition, which will both simplify the programmatic offerings and encourage increased energy efficiency in states that have not adopted newer versions of the IECC.

### Introduction of National SFNH Version 3.2 and MFNC Version 1.2 Program Requirements

- 1) Are there any available data or analyses to indicate that EPA's proposed SFNH Version 3.2 and MFNC Version 1.2 program requirements are not warranted or that the proposed efficiency levels are not achievable or cost-effective?

[Add comments]

- 2) Is the proposed more stringent thermal backstop for SFNH Version 3.2 and MFNC Version 1.2, aligned with the 2021 IECC, appropriate and achievable?

IECC 2021 as the backstop is aggressive. While some states are set to adopt the 2021 standard in the near future, it we don't yet know what may be amended out. Where there are concerns regarding cost effectiveness related to measures such as the R-5 continuous insulation, adoption of the 2021 IECC as the backstop may limit participation in the ENERGY STAR program. We suggest that instead using the 2018 IECC as a backstop.

- 3) For SFNH Version 3.2, is the proposed more stringent alternative backstop for homes with low infiltration, defined as  $\leq 115\%$  of the total UA resulting from the U-factors in the 2021 IECC, appropriate and achievable? Should this alternative backstop be restructured to better target the types of homes most likely to use it (e.g., homes with ducts in an unvented attic)?

We support this UA alternative.



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- 4) Should EPA maintain its previous policy of requiring that the new version of the program be used to certify homes and apartments permitted one year after the date of implementation of the state's new code for the proposed SFNH Version 3.2 and MFNC Version 1.2 program requirements?

Yes, maintain consistency in the implementation timeline.

- 5) In the new MFNC Reference Design, EPA is proposing to include a 1.2 EF water heater. This efficiency level falls between what is available for electric tank products and heat pump products and was selected to require apartments with electric water heating to install heat pump water heaters when using the Prescriptive Path, while not making it prohibitively difficult to achieve the ERI target for those using the ERI Path. Is this an appropriate level of water heater efficiency for EPA to include in the proposed new MFNC Reference Design?

There should be an alternative noted for central/commercial water heating that does not utilize the same rating standard

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

We support HVAC grading as an option, as it currently is in v3.1, but do not agree with making HVAC grading mandatory at this time. It is currently a voluntary option that appears to have little uptake, which means there is limited data to support its impact.

## Introduction of New Certification Label to Accelerate Construction of Next Generation of Homes & Apts.

### General

- 1) Do you have general feedback on this topic?

[Add comments]

### Energy Efficiency Prerequisite

- 1) Are EPA's proposed energy efficiency requirements at an appropriate level for the new certification?

[Add comments]

### ENERGY STAR Certified Connected Heat Pumps

- 1) EPA is proposing that all installed heat pumps must use the HVAC Grading Track and achieve Grade I for all elements. Is mandatory HVAC grading and achieving Grade I in homes an appropriate requirement for the new certification?

We support it as an option, as it currently is in v3.1, but do not agree with making HVAC grading mandatory at this time. It is currently a voluntary option that appears to have little uptake, which means there is limited data to support its impact.

- 2) EPA is proposing that all installed heat pumps must meet EPA's 'connected' criteria or use an ENERGY STAR smart thermostat. Are these connected options appropriate requirements?

Yes, this is appropriate. However, we suggest that you clarify the connected criteria and type of controls permitted to meet the requirement.

- 3) EPA is not proposing to include space conditioning or connected requirements for non-dwelling unit spaces in multifamily buildings. Is this an appropriate and advisable exemption?

We support this exemption.



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- 4) EPA is proposing that cold climate heat pumps be required in Climate Zones 5-8. Are these the most appropriate areas for requiring these systems? Should any Climate Zones be added or any eliminated?

This is appropriate, and already standard practice in many areas.

## ENERGY STAR Certified Heat Pump Water Heaters

- 1) EPA is proposing minimum tank size requirements to help ensure that the heat pump is used as the primary water heating source, rather than the electric resistance backup coil. Is this advisable, and are the proposed tank sizes appropriate?

These tank sizes do not align with what is commonly seen in various unit sizes. For example, it is far more common to see a 75 gallon tank in a 3 Br unit than an 80 gallon.

- 2) EPA is proposing that heat pumps installed in occupiable space have a sound rating of  $\leq 55$  dBA. Is this an appropriate threshold?

We completely support this requirement, as noise concerns are a primary deterrent from the use of heat pumps.

- 3) EPA is proposing that heat pump water heaters will be mandatory to earn the new certification for all types of new construction, including multifamily. Should EPA consider allowing conventional electric water heaters while the market develops new heat pump water heater solutions?

For the purpose of this new certification, we feel it is appropriate to require heat pump water heaters.

## Induction/Electric Cooking

- 1) EPA is proposing an exemption from the certification requirement for induction cooktops and ranges in government-subsidized affordable housing projects, where conventional electric cooktops will be allowed as an alternative. Is this allowance appropriate and advisable for affordable housing?

Yes, there should be an exemption for affordable housing in consideration of the increased expense of the cookware required for induction cooking.

- 2) Should EPA also consider allowing conventional electric cooktops in market-rate housing as an alternative to induction?

If the goal is to drive the market towards electrification, and towards the use of induction cooking, then no, there should not be an allowance for conventional electric cooktops for market rate housing.

## Electric Vehicle Charging Capability

- 1) Are EPA's proposed requirements for private EV-Ready spaces and/or installed EV chargers and EV-Capable parking spaces appropriate?

We propose that instead of requiring level 2 chargers across the board, there should be an alternative that allows for the installation of level 1 chargers at a higher rate. For example, if a project would have required 5 level 2 chargers, they may instead be required to install 10 level 1 chargers, which would increase the capacity for a multifamily building or development.

- 2) EPA is proposing to cap the number of required EV-chargers for a development at five (5). Is this an advisable limit?

No, there should not be a cap on the number of EV chargers. It should instead simply be based on the percentage of units if the goal is to increase the availability of chargers and the adoption of EV.

- 3) Some concern has been expressed that the addition of an EV charging circuit would require a costly upgrade to 400-amp service. EPA believes this will be a relatively rare occurrence (and may become even rarer with emerging tech



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solutions that could eliminate the need for upgrades). Is EPA underestimating the frequency with which this might occur, and if so, should the requirement be changed?

[Add comments]

- 4) EPA is not proposing to relax the EV-Ready or EV-Charging requirements for government-subsidized affordable housing. Should EPA consider setting alternative EV charging infrastructure requirements (or have no EV requirements) for affordable housing?

No, affordable housing should have the same requirements, allowing the same access to charging resources that market rate housing has as the market moves towards EV.