



Proposals for Rev. 05 of the ENERGY STAR Multifamily New Construction Program

Stakeholder Comment Form

Please submit written comments to energystarhomes@energystar.gov no later than August 15, 2024, using this template.

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

Organization Name: Northeast Home Energy Rating System Alliance (NEHERS)

Respondent Last Name: Zeis

Respondent First Name: Cindy

Comments:

Proposal to limit townhouse eligibility to Single-Family New Homes

- 1) Do you agree with the EPA's proposal to only allow townhouses to be certified through the SFNH program?

No

- 2) Are there any significant benefits to maintaining a pathway for townhouses to be certified through the MFNC program that the EPA has not considered?

Buildings that have both stacked units and townhouse units, particularly when they have shared MEP, should be able to follow the same MF path for all units.

Proposal to require MFNC Workbook for all buildings

- 1) Currently for ERI Path buildings, there isn't a standard template required to document compliance with common space requirements (e.g., the thermal backstop, HVAC efficiencies, etc.). This flexibility creates challenges and inconsistency. Do you agree with the EPA's proposal to require that the MFNC Workbook be submitted for buildings certified through all pathways (including the ERI path)?

Yes/NO Significant improvements need to be made to the workbook to make it more user friendly. Hopefully, with streamlining of processes the workbook can be improved upon.

- 2) Are there any significant benefits to continuing to allow ERI path buildings to be certified without using the MFNC Workbook that the EPA has not considered?

This may present significant challenges for newer raters/verifiers given the comprehensive nature of the workbook. This may also present additional workload for rating companies who currently use field checklists or proprietary field data collection tools.

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

1- For Phius projects, this creates an additional unnecessary burden to the rater/verifier. Although there is overlap, not all items are duplicated. A project seeking Phius certification would have multiple workbooks to manage given the current program prerequisites.

2 - Recommend that the DOE and EPA consolidate workbooks to decrease documentation burden. It would be beneficial to have a comprehensive workbook incorporating ENERGY STAR, IAP, and ZERH with the ability to select the programs and pathways the rater/verifier will be using. Incorporating QA checkboxes within the workbook would also be beneficial for HCO staff who are performing QA functions.



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Proposal to streamline insulation and reduced thermal bridging details

- 1) Do you agree that converting some mandatory reduced thermal bridging details to optional ones, while eliminating the exemptions, will result in comparable performance for most buildings?

Yes, standards are continually advancing resulting in more reliable capturing of thermal bridging details.

- 2) Do you have feedback on any other specific elements of the proposal?

[Add comments]

Proposal to transition to Track A: HVAC Grading by Rater and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B – HVAC Testing by Agent?

Rather than eliminating Track B totally, this items should remain in tact, without Contractor Accreditation requirements as an option since fully eliminating this track may have unintended consequences for raters/verifiers and the program. See additional notes for justification below.

- 2) Are there any significant benefits to maintaining Track B that the EPA has not considered?

There are some jurisdictions that require specific licenses/certifications to perform these tasks. This also increases liability to rating companies. How will insurance carriers respond to issues that arise by non-licensed professionals accessing areas of HVAC air handler cabinets and conducting power measurements on live equipment.

- 3) Do you agree that the proposed airflow test requirements and duct leakage limits are achievable in common spaces served by residential-sized indoor units?

Yes

- 4) Does the proposed transition date of buildings permitted 1/1/2026 provide sufficient time to prepare?

A ramp-up process should be deployed to allow raters to build proficiency and allow for industry response based on in-field experiences. If moving forward with this adjustment, proposed mandatory compliance date of 1/1/2027.

- 5) Do you have any feedback on any other specific components of the proposal?

Not at this time.

Proposal to streamline mandatory lighting requirements

- 1) Do you agree with the EPA's proposal to require 90% LEDs in all common spaces and all paths, with no alternative to use LPDS?

Yes

- 2) Do you have any additional feedback on this proposal?

This simplifies processes for raters/verifiers

Proposal to consolidate ASHRAE Path performance target & documentation and add a fuel neutral approach

- 1) Do you agree with the EPA's proposal to update the Version 1.1 performance target to 15% over 90.1-2016 for all states?

[Add comments]



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- 2) Do you agree with the EPA's proposal to require use of the DOE Compliance Form and Companion Tool for all ASHRAE Path buildings?

[Add comments]

- 3) To provide feedback on the fuel neutral approach below, please first evaluate the savings for individual buildings and send us your results including the Compliance Form, Companion Tool, and the Building Efficiency Characteristics (or MFNC Workbook) for the building.

- A. For buildings with either electric heating in Climate Zone 3B-8 AND/OR electric water heating, does the fuel neutral savings generated from the Companion Tool seem appropriate for the building? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? If not electric, what fuel was used for heating/water heating?

[Add comments]

- B. For gas heated buildings in Climate Zone 1-3A, do the fuel neutral savings generated from the Companion Tool seem appropriate for the buildings? Please comment whether ASHRAE 90.1-2016 or ASHRAE 90.1-2019 was used. If not appropriate, were the savings higher or lower than expected? What fuel was used for water heating?

[Add comments]

- C. Should we require the fuel neutral approach be used by all buildings?

[Add comments]

- 4) Do you have any additional feedback on this proposal?

[Add comments]

Proposal for the transition to whole-building modeling Path in California

- 1) Do you agree with a building-level 10% performance target for CA v1.2 and v1.3?

[Add comments]

- 2) Are any MF dwelling units modeled separately for code under Title 24 2016 or 2019?

[Add comments]

- 3) Is the 10% savings target for common spaces when modeled separately reasonable?

[Add comments]

- 4) Do you have any additional feedback on this proposal?

This proposal is being issued on behalf of the Standards Committee of the Northeast Home Energy Rating System Alliance, which represents more than 260 Raters and 11 Providers from New Jersey to Maine.