



# Proposals for Rev. 14 of the ENERGY STAR Single-Family New Homes Program Stakeholder Comment Form

Please submit written comments to [energystarhomes@energystar.gov](mailto: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 eliminate mandatory reduced thermal bridging details

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

Yes, as stated in the webinar ANSI/RESNET/ICC 301 is continually advancing resulting in more reliable capturing of thermal bridging details.

- 2) Will the new item added to the Rater Design Review Checklist help encourage partners to consider, and plan for, the use of reduced thermal bridging details?

Yes, this will hopefully encourage design professionals to increase their proficiency and add these details to their design drawings. This will hopefully also encourage design professionals to include raters/verifiers at the design stage.

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

Not at this time

## Proposal to streamline air sealing details and add infiltration backstop

- 1) Do you agree with the proposed edits to streamline or eliminate certain mandatory air sealing details?

Yes, as it pertains to air sealing. Since item “d” includes elimination of gasket beneath above-grade sill plates it may be beneficial to still require the sill seal for walls “resting atop concrete/masonry” since this is an area where moisture migration may be an issue in addition to air sealing benefits.

- 2) Are there additional opportunities that you would recommend to further streamline or eliminate the mandatory air sealing details?

Not at this time.

- 3) Do you agree that the newly proposed leakage limits are achievable?

Yes – the 4.0 – 4.5 ACH limits align with and/or exceed most code and program requirements and appears to already be met in >70% of current ES certified dwellings. In many cases, this aligns with being an “above code” requirement for AHJs adopting the 2021 IECC.

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

Consider using a CFM50/sf enclosure area metric instead of ACH50. Or, as an alternative if ACH is desired for specific applications the ability to use ACH50 or CFM50/sf.



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## Proposal to narrow scope of builder-verified items

- 1) Do you agree that it's appropriate to classify each item as one that cannot be builder verified, one that can be partially builder verified, or one that can be fully builder verified?  
Yes, as long as there is sufficient clarification in the footnotes clarifying the 10% allowance.
- 2) Do you agree that reducing the allotment of builder verified items to five is justified given the other revisions proposed?  
Yes
- 3) The EPA is proposing that Item 4.1.2, which requires the sealing of fire-rated area separation walls, not be eligible for builder-verification. Is it correct to assume that Raters should be able to verify this Item during their inspection?  
Yes – since this is a typical area of concern/failure for unit compartmentalization, we agree this area should not be included as a builder-verified item e.g., the rater/verifier must inspect this detail.
- 4) Do you have any other feedback on this topic?  
Not at this time.

## Proposal to transition to Track A: HVAC Grading and sunset Track B

- 1) Do you agree that it is appropriate to sunset Track B?  
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) Does the proposed transition date of 1/1/2026 provide sufficient time to prepare, with the understanding that only Task 3 will be brand new?  
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.
- 4) Do you believe that the EPA should require that Tasks 4 and 5 be completed, in addition to Tasks 1 through 3 of Std. 310?  
[Add comments]
- 5) Do you have any other feedback on this topic?  
The HQuito credentialing process does not necessarily guarantee proper installation and commissioning of systems. As an alternative, if Track A is kept as optional, make the commissioning checklist required with some rater verified items such as airflow, and measures that do not require specialized licensure and knowledge such a electrical for power measurements. We have to acknowledge the variety of skill levels of 3<sup>rd</sup> party verifiers and avoid unintended consequences of decreased program and partner participation while also acknowledging the work of skilled HVAC installers and designers. We need a policy that supports flexibility and promotes cross-trade collaboration.

## Proposal to sunset the Water Management System Builder Requirements

- 1) Do you agree that it is appropriate to sunset the Water Management System Builder Requirements?



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Yes

- 2) Are there any significant benefits to maintaining the Water Management System Builder Requirements that the EPA has not considered?

[Add comments]

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

Not at this time

***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.***