ENERGY STAR National Program Requirements
SFNH Version 3.3 / MFNC Version 1.3 Stakeholder Comment Form

Please submit written comments to energystarhomes@energystar.gov no later than November 21, 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:

General

This feedback 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.]

Definition of more stringent performance targets in new versions

1) The EPA is proposing more stringent performance targets for the next national versions of the ENERGY STAR Single-Family New Homes (SFNH) and Multifamily New Construction (MFNC) program. Do you have any specific feedback on these proposed new performance targets?

    a) <u>For SFNH,</u> initial modeling indicates the proposed ENERGY STAR ERI targets will be ~45-50 for most homes.

    b) <u>For MFNC,</u> for most dwelling units in the ERI Path, initial modeling indicates the proposed ENERGY STAR ERI targets will be ~40-50; for buildings following the ASHRAE Path, the proposed performance target is 15% savings over ASHRAE 90.1-2022; and for buildings following the Prescriptive Path, the proposed measures of the ENERGY STAR MFNC v1.3 Reference Design are required.

    No Comment

2) Do you have additional general feedback on this topic?

    No comment

Thermal backstop aligned with the 2024 IECC prescriptive path in new versions

1) The EPA is proposing to align the thermal backstop of the next national program versions with the prescriptive path of the 2024 International Energy Conservation Code. This continues prior precedent of aligning with the prescriptive path of the IECC edition that the version was developed in response to. Do you have any specific feedback on the proposed thermal backstop for the new program versions?

    We would like to see flexibility in the backstops, e.g., ceiling insulation could be lower r-value if continuous insulation were used e.g., SIPs and other strategies. Aligning the backstop with the 2021 IECC would more closely align with current DOE ZERH v2 requirements. If using more stringent backstops, allowance of alternate u-value tables may be allowed.

2) Do you have additional general feedback on this topic?

    Our concerns are that not enough consideration is being made for more progressive, energy efficient strategies and components.

More Stringent Infiltration Backstop for the new version of the SFNH Program

1) The EPA has previously proposed introducing an infiltration backstop in the next revision of its SFNH program requirements, with a backstop of 4.5 ACH50 for National v3.1 and 4.0 ACH50 for National v3.2, with an alternative for homes smaller than 1,500 sq. ft. and attached homes. For the next national version of the SFNH program requirements, the EPA is proposing to advance the infiltration backstop to 3.5 ACH50, while maintaining the same alternative metric for small homes and attached homes. Is there any reason to believe that this is not achievable for homes certified using the new version?

   We would like to see an alternative for attached single-family dwellings to allow the use of the .27cfm50/sq.ft. as allowed under the multifamily guidelines, or ACH50 adjusted using the RESNET 301 adjustment factor.

2) Do you have additional general feedback on this topic?

   We would like to restate our view on the HVAC grading requirement. This adds substantial time to a HERS Rater/Verifier's workscope. Allowing Track A & Track B would be preferable to offset this burden.

   Training: We would like to see a training requirement similar to what has been proposed for QADs. This could simply be allowing the HCO to utilize the EPAs version/revision launch video as a means to require viewing of the updates. Make this available through the HCOs training portals.