



ENERGY STAR®

Residential New
Construction



Dear ENERGY STAR Stakeholder,

EPA thanks all of the stakeholders who provided comments on the ENERGY STAR Residential New Construction Program Roadmap/Framework Document. Based on stakeholder feedback received on Draft 1 of the proposed program requirements for Single-Family New Homes (SNFH) Version 3.2 and Multifamily New Construction (MFNC) Version 1.2, EPA has developed a revised Draft 2 of the program requirements, which is now available for comment. All of the comments received on Draft 1, a summary of comments and EPA's responses, a redlined version of the Draft 1 proposal, and the revised Draft 2 can all be found on the [ENERGY STAR website](#).

Please submit written comments to energystarhomes@energystar.gov using the provided [Stakeholder Comment Form](#) no later than **April 15, 2022**. As a reminder, all comments received will be posted on the ENERGY STAR website.

While commenters provided feedback on a variety of issues related to the proposed new SNFH Version 3.2 and MFNC Version 1.2 program requirements, the majority of comments received were related to the new proposed Thermal Backstop. EPA appreciates the variety of input received on this issue.

Additional context is provided below, but the primary change contained in Draft 2 is that EPA has revised the proposed thermal backstop in Draft 2 of the SFNH v3.2 and MFNC v1.2 program requirements. While the original proposal to align the thermal backstop with the 2021 IECC has been retained, a transition period has been added to allow homes and apartments permitted before January 1, 2025, to be certified with a total building thermal envelope UA that is less than or equal to 105% of the total UA resulting from the U-factors in the 2021 IECC.

The thermal backstop defines the minimum levels of insulation and window performance that a home or apartment must use and is designed to ensure that insulation and windows are not traded off for other efficiency measures to a degree that EPA believes would negatively impact performance and homebuyer comfort. EPA recognizes that some stakeholders have advocated for keeping the backstop at the 2021 IECC prescriptive levels, or an equivalent UA value, as originally proposed, while others support a less stringent backstop that would allow for more flexibility in tradeoffs of the envelope with other measures.

EPA notes that there is precedent for EPA setting the thermal backstop in alignment with the Reference Design, as it did when SFNH v3.0 and MFNC v1.0 were first introduced, as well as for setting the backstop at a lower level than the Reference

Design, as it did for SFNH v3.1 and MFNC v1.1. In this case, EPA believes it is important to set a high bar for the insulation and window levels to ensure the long-term performance of certified homes and apartments as the program advances.

At the same time, EPA recognizes that increasing the thermal backstop from the 2009 IECC (as used in the prior versions) to the 2021 IECC is a significant advancement, and based on the feedback received, EPA believes that providing partners with additional time to prepare for such a change is warranted, particularly in the first states to have the new versions enforced.

As a result, EPA has revised the proposed thermal backstop in Draft 2 as described above. This represents a significant immediate and long-term advance in the thermal backstop while providing partners and the market with a reasonable amount of time to develop solutions that achieve the full 2021 IECC enclosure levels.

EPA looks forward to receiving stakeholders' feedback on the revised Draft 2 proposal.

Best regards,

The ENERGY STAR Residential New Construction team

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