

**Summary of Comments, EPA Responses, and Resulting Policy Changes on Draft 1
ENERGY STAR Single-Family New Homes (SFNH), California Program Requirements, Version 3.3,
ENERGY STAR Multifamily New Construction (MFNC), California Program Requirements, Version 1.3,
and Extension of Home Certification Organization (HCO) Oversight to California**

EPA has posted a compilation on its website of all comments received during the stakeholder feedback period, which ended May 2, 2022, for its first draft of the ENERGY STAR SFNH, California Program Requirements, Version 3.3, ENERGY STAR MFNC, California Program Requirements, Version 1.3, and Extension of Home Certification Organization (HCO) Oversight to California.

This document contains a summary of these comments, along with EPA's responses and the resulting policy change, if any.

When similar comments were received from multiple respondents, EPA has consolidated these ideas into a single summary bullet. However, EPA has attempted to retain all unique comments received, including those submitted by a single respondent.

ENERGY STAR SFNH CA Program Requirements, v3.3; MFNC CA Program Requirements, v1.3; and HCO Extension

ID	Comment Summary	EPA's Response
Performance Targets		
1	<ul style="list-style-type: none"> To simplify the proposed requirements, one commenter recommended that the performance target be defined solely using the Compliance Margin metric and the Efficiency EDR metric be removed. 	<ul style="list-style-type: none"> EPA believes that there is value in retaining both performance metrics as it has done with prior versions of the program requirements. Both metrics can be used to demonstrate an improvement relative to the code requirements. As the commenter noted, the two metrics value measures in slightly different ways; thus, retaining both provides partners with added flexibility. Finally, because Title 24 compliance software can produce both metrics using standard reports, partners will be able to easily assess whether they are meeting one or both performance targets.
Mandatory Requirements		
2	<ul style="list-style-type: none"> Four commenters suggested that EPA require all homes and apartments certified using the proposed program requirements to be all-electric. They noted that the next revision of the code in California, the 2022 edition, will incentivize electrification of end-uses and that multiple local jurisdictions within the state already encourage or require electrification. 	<ul style="list-style-type: none"> EPA agrees that strategic electrification will play an increasingly important role in meeting emissions reduction targets. It is for this reason that EPA has proposed a differentiated program, launching next year, to provide additional recognition for next-generation homes and apartments that meet this challenge now. EPA will monitor the success and uptake of the new certification to determine when it is appropriate to begin integrating such features into the base program. <p>In addition, as noted in the webinar that introduced the proposed program requirements, this is EPA's response to the 2019 edition of the state code. Because enforcement is based on a variety of factors, including plan approval dates and permit dates, EPA anticipates that homes and apartments will continue to use this edition of the code well beyond the initial enforcement of the 2022 edition. EPA anticipates that it will begin working on its response to the 2022 edition of the code later this year and will account for the new requirements of that edition at that time.</p>
3	<ul style="list-style-type: none"> One commenter suggested that the reduced thermal bridging benefits of removing top plates from walls in California are often offset by increased framing to retain shear strength. 	<ul style="list-style-type: none"> EPA notes that the current and proposed program requirements do not require the removal of top plates from walls. Homes and apartments are required to select a strategy to reduce thermal bridging. One of those strategies is 'advanced framing,' but the mandatory details contained within do not include the removal of top plates.
4	<ul style="list-style-type: none"> One commenter requested that EPA clarify what requirements must be met, in addition to the performance target, for homes and apartments to be certified. 	<ul style="list-style-type: none"> Both the current and proposed program requirements include an exhibit defining what requirements must be met in addition to the performance target. The exhibits are titled 'Mandatory Requirements for All Certified Homes' for the Single-Family New Homes program and 'Mandatory Requirements for All Certified Multifamily Buildings' for the Multifamily New Construction program and list the program documents with the requirements that must be satisfied (e.g., National Rater Design Review Checklist, National Rater Field Checklist, National Water Management System Requirement, etc.).
Extension of Home Certification Organizations (HCO) Oversight to California		
5	<ul style="list-style-type: none"> Two commenters expressed support for the proposal to extend HCO oversight to California, with one adding it would be ideal if current oversight organizations in the state were integrated into this new oversight structure. 	<ul style="list-style-type: none"> EPA appreciates the commenters' support for the proposal. We are actively working with the current oversight organizations in the state and nationally to ensure they are informed about the proposed extension of HCO's to California.