Efficiency First, the Residential Energy Services Network (RESNET), the ECOBROKERs support the guiding principles stated by the U.S. Department of Energy. However, we are concerned that what is proposed will not meet these principles. We respectfully submit the consensus recommendations of our three organizations related to the issues below which must be addressed to improve the viability and success of labeling effort:

1. The quality of the inspection used to obtain the DOE National Energy Rating Program for Homes' label.
    - A whole house diagnostic inspection adds significant value to the occupant and improves adoption of measures in part by better integrating non-energy benefits with energy benefits.
    - Therefore there should be two differentiated approaches to obtaining a home energy label:
        - ✓ Current industry best practice for whole house recommendations including performance testing for air leakage, duct leakage and health and safety performed by a credentialed individual operating in a quality assurance context. The energy model is developed with input from the actual energy bills if they are available. The asset label is produced and a more granular numeric score is used. This process provides a degree of accuracy that can support the more granular label.
        - ✓ A new process based on a walkthrough inspection that produces a quick asset label based on a letter based scoring system. Without critical information such as air and duct leakage accuracy is limited and the results should not be placed on a level playing field with the diagnostic approach of RESNET and BPI.
    - A two tiered label approach that supports both of the above models is important. Based on the accumulated experiences of our members from across the country, we assert that adopting a low/cost label/audit solely will likely undermine the conduct of comprehensive assessments and thus reduce the number of retrofits actually being done. If saving energy is the ultimate public goal, this unintended

result must be avoided in order to fulfill the core goal of the initiative. DOE should be careful to test the implementation of the low cost label to be certain that it is not reducing the number of whole house retrofits being done. This is best done in an area with an active Home Performance with ENERGY STAR program.

- Concern about gaming between bins is less critical than protecting our existing national whole house retrofit industry. Varying the granularity of the label is an easy and effective way to integrate the delivery of the two audit approaches.
- A limitation on the score available from the quick approach could also be considered. As in the HERS process assumptions about air and duct leakage can be limited unless proven by testing.

2. The basis for the DOE National Energy Rating Program for Homes' label.
    - The organizations support an asset based rating based on standardized occupancy assumptions and would be pleased to support DOE in further defining this rating.
    - We support source energy as the basis for the rating method .

3. The software available to generate the DOE National Energy Rating Program for Homes' label.
    - Instead of requiring a single software program, DOE should establish a standard to ensure the consistency of software programs in the market and a suite of tests the tools must pass to be approved by DOE. RESNET can assist in this process and has developed a retrofit software committee that is seeking to coordinate with BPI on developing industry standards for calculating energy savings for existing buildings.
    - By having the DOE set a standard for software programs to abide by, the standards can be used as building blocks to develop a comprehensive home auditing and retrofit program nationwide. All software programs should meet the standards set by the DOE for the Home Labeling program that will accurately and consistently compute the score. For example, energy software could add a component to the HERS software to compute the DOE score. By allowing the market to develop its own software programs, private investment can help drive innovation, more retrofits and therefore more jobs will occur, and higher standards will evolve. Relying on the federal government for sustained innovation can weaken the industry in the long term.

4. Recommendations associated with the score , including potential costs
    - A standardized national pricing structure for energy efficient improvements is not feasible for all locations in the country. It is our opinion that a national pricing structure will produce inaccuracies due to the many different markets in the US and therefore would invalidate the effectiveness of the program. Instead of providing pricing for the energy efficient improvements, the program should provide referrals to RESNET or BPI certified energy audit professionals or BPI contractors. Life cycle savings information can provide consumers with an easy ability to compare costs to life time savings.

5. The certification and training of the people providing the score.
    - RESNET has a broad base of accredited training providers with relevant curriculum, informed trainers and training facilities. BPI has a similar network of affiliates that provide training. Leveraging these networks is faster to market and more efficient than creating a new network. Leveraging the existing networks will also make more sense as a long term integrated model where fast audits feed into diagnostic audits.
    - Failure to note BPI and RESNET as a provider of certifications in this area is a serious problem in the RFI.
    - The Federal government has provided millions of green initiative dollars to train unemployed people in BPI and HERS auditing and that group of individuals should be put to work. If additional training is required for the DOE Home Labeling program, the training can be provided by the existing training certification providers – BPI, RESNET, LEED, Build It Green.

6. Standards for electronic transfer of information.
    - Information standards for ratings and retrofits are under development by both BPI (retrofit and testing information) and RESNET (rating information) and should be leveraged as part of this effort.

7. Quality assurance
    - RESNET and BPI have existing mechanisms for quality assurance, RESNET for the accuracy of ratings and BPI for the quality of installations. These existing networks can be utilized quickly and will compliment other initiatives such as Home Star.

8. Referrals
    - The quick label process needs to be set up to provide referrals to qualified providers of diagnostic audits and tested retrofits. RESNET and BPI each provide lists of raters and contractors respectively.

9. Application to intended use cases.
    - The label at time of sale is actually needs to be a label at time of listing for it to be able to impact the sales process. Home inspectors currently work for the buyer. There is no buyer at time of listing. Does DOE propose to create an entirely new line of business for home inspectors who work for the seller to deliver labels?
    - A critical use case is the delivery of a label after a retrofit in order to better incorporate the value of the retrofits into the value of the house. Does DOE propose that retrofits buyers hire an additional party to come out and deliver a label after a retrofit is completed? Smooth integration of the rating with the retrofit process is of critical concern.
    - Remodeling is another use case. Does a remodeler use the home inspector as an energy consultant to help make decisions? They do not seem qualified to provide this service. The existing energy rating infrastructure should be able to integrate the label into their services.
    - Low income is another use case. How will the low income programs use labels?

We appreciate the opportunity to submit our comments.

Sincerely,

Greg Thomas
Efficiency First

Steve Baden
RESNET

John Stovall
Eco-Brokers