



America's Home Performance Workforce

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Efficiency First supports the guiding principles stated by the U.S. Department of Energy. However, we respectfully submit these recommendations related to the issues identified below which must be addressed in order to ensure the viability and success of a nationally coordinated labeling effort:

The Department of Energy should work with existing residential energy efficiency industry standard setting organizations in the implementation of its guiding principles. Most notable are RESNET and the Building Performance Institute. Coordination with these entities will greatly increase the on the ground support for the initiative and will embed the standards in organizations with more than a temporary interest in the outcome.

Coordination with the existing retrofit industry will require modest changes to the proposed delivery approach. A low cost delivery of a label must not reduce the effectiveness of the comprehensive inspections of buildings. Low cost audits have been used repeatedly to attempt to move the marketplace towards adoption of retrofits. Most notably, low cost audits delivered through the national

Residential Conservation Service (and continuing into the present in Massachusetts) and low cost audits integrated with home inspections in California have both attempted to stimulate consumer investment in efficiency. While the actual measured savings results of these programs are lacking, significant impacts seem to be seriously missing. The evaluations of these types of program have typically included low cost measures as part of measuring the number of households taking "action", distorting the ability to measure significant consumer investment in retrofits. At a time when it is increasingly clear that we need to stimulate consumer investment, it is unclear why DOE would undertake an effort that seems to repeat approaches that have not worked in the past.

It is critical that DOE not interfere with the ability of the existing marketplace to deliver actual energy efficiency installations in an attempt to implement a program with what are still hypothetical benefits. This interference could happen through a number of channels. First, low cost audits/labels can displace consumer interest in diagnostic audits, potentially resulting in a drop in retrofits. Second, imposition of a single piece of software on the market, even temporarily, can interfere with private investment in software tools that are integrated into the retrofit business process. These integrated software tools work to increase the efficiency of the market in the delivery of measured performance. Third, labels should be routinely delivered as part of the post retrofit test out process operating within a third party quality assurance process, without a need to call in a redundant third party home inspector. The remedies to these issues are not complicated and can be accomplished under the guiding principles established by DOE.

First, DOE should be careful to test the impact of labeling on measured rates of actual savings, in areas with active retrofit markets, an active Home Performance with ENERGY STAR program for example, looking for ways to improve the interaction, before a national framework is announced. Mechanisms for integrating with existing retrofit programs are addressed in the joint RESNET-Efficiency First- EcoBroker comments.

Second, DOE should create short term mechanisms for existing credentialed software to produce ratings, while working on long term infrastructure. The proposed RESNET standards for retrofit software

credentialing are strong tests of software and can provide a fast third party mechanism that will not harm the existing market while a national rating infrastructure is established while allowing new tools to be easily developed. Label calculations of the standardized energy usage calculation type suggested by DOE are easy to implement.

Third, where existing quality assurance networks can support field inspection, allow BPI contractors and RESNET raters doing or managing retrofits to offer the post retrofit rating. This will integrate the ratings into existing retrofit programs and expand the impact of the ratings as well as help homeowners to embed the value of their retrofit investment into their home.

Fourth, provide clear differentiation between the energy savings and improvement recommendations that are produced by a comprehensive diagnostic approach combined with an energy simulation and those that are produced by a simple visual inspection and an energy simulation. A two tier energy label is one possible approach to this, with letter for the visually determined rating and a more granular and accurate number resulting from comprehensive testing.

Fifth, work with the existing national BPI and RESNET training and certification infrastructure that is training the workforce to perform comprehensive inspections to train and credential the individuals performing the low cost inspections. This will reinforce infrastructure and improve coordination between the two types of inspections.

Sixth, quality assurance for the labels and associated recommendations is critical to achieve accuracy. The existing quality assurance systems of BPI and RESNET provide an existing network to leverage.

Many of the above topics and others have been addressed in the combined RESNET, Efficiency First and EcoBroker comments that are included with this submission. We appreciate this opportunity to provide comment and look forward to further discussions with the Department of Energy on this complex subject. DOE has done an excellent job of defining the issues and can now move forward in working with the retrofit industry and others in implementing a compatible standard.

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Chairman of the Board

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## **ABOUT US**

Efficiency First is a national nonprofit trade association that unites the Home Performance workforce, building product manufacturers and related businesses and organizations in the escalating fight against global warming and rising energy costs. Efficiency First represents its members in public policy discussions at the state and national levels, to promote the benefits of efficiency retrofitting and to help our industry grow to meet unprecedented demand for quality residential energy improvements.

**Efficiency First represents 939 businesses in all 50 U.S. States and the District of Columbia.**