

DRAFT

Air Quality Public Advisory Committee

Metropolitan Washington Council of Governments

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<http://www.mwcog.org/dep/air/aqpac.htm>

January 5, 2011

U.S. Department of Energy
Building Technologies Program (BTP)
Room 6070, MS EE-2J
1000 Independence Ave, SW
Washington, DC 20585

Re: Home Energy Score

To Whom It May Concern:

I am writing on behalf of the Air and Climate Public Advisory Committee (ACPAC) regarding the US Department of Energy Home Energy Score. ACPAC serves as an advisory committee on air quality, climate and energy efficiency issues to policy committees of the Metropolitan Washington Council of Governments (COG).

ACPAC supports the development of the Home Energy Score tool and would like to congratulate the Building Technologies Program on the launch of the pilot programs. Having a home energy consumption comparison tool similar to a vehicle's mile-per-gallon rating will provide valuable information to homeowners across the country. ACPAC has reviewed and discussed the Home Energy Score and would like to offer comments for your consideration including:

1. Providing a CO₂ equivalent instead of a just BTU equivalent

Reporting energy use in Million British Thermal Units (MBTUs) supplies a relative energy performance; however, providing a CO₂ equivalent with a brief explanation would allow homeowners the ability to make a comparison on environmental performance of energy sources used in their home.

2. Addressing air quality issues when recommending home energy improvements

In order to educate homeowners on how to protect indoor air quality while making home energy improvements we recommend the Home Energy Score follow the development of the US Environmental Protection Agency's (EPA) Draft Healthy Indoor Environment Protocols for Home Energy Upgrades and incorporate its final recommendations, as appropriate, into the Home Energy Score program.

The Air and Climate Public Advisory Committee is an advisory body to the Metropolitan Washington Air Quality Committee and the Climate, Energy and Environmental Policy Committee.

3. Clarifications on sources used for the Home Upgrade Recommendations

The homeowner needs clarification in order to understand how accurate and applicable this information is to him or her. The Home Upgrade Recommendations should state that the source for the payback period is a national measures database built by the National Renewable Energy Lab, that the utility bill savings are based on state averages and the greenhouse gas reductions are based on EPA eGRID regions. It should also be clear if and how the payback period may be affected based on a local contractors quote versus the national average payback period supplied.

4. Providing information to homeowners on local incentives

In order to educate homeowners on assistance that is available to them and to further encourage implementation of recommended measures information on local incentive programs should be provided to homeowners.

5. Rating a building's performance without considering operations of that building

A home's performance depends on the occupants' behavioral habits/operation of the home. The Home Energy Score could give a homeowner the assumption that they are very energy efficient when, in fact, there is much room for energy efficiency improvement based on behavioral factors. The Home Energy Score does offer some select generic tips to save energy; however, it would be much more beneficial if the tips provided were customized to the homeowner.

Thank you for considering our concerns about the Home Energy Score. We hope they will be useful as you analyze the pilot program and make improvements to the tool in summer 2011.

Sincerely,

Deron Lovaas, ACPAC Chair