



May 17, 2019

US Environmental Protection Agency
Climate Protection Partnerships Division
ENERGY STAR
1200 Pennsylvania Ave NW
Washington, DC, 20460 US
Comments submitted via email: energystarhomes@energystar.gov

Dear ENERGY STAR Team:

Owens Corning submits the following comments on the proposed changes to the eligibility requirements for organizations seeking recognition as a Verification Oversight Organization (VOO) for the ENERGY STAR Certified Homes Program. In summary, our comments cover the following:

1. Ensuring the Integrity of the ENERGY STAR Brand
2. Establishing a Level Playing Field
3. Signaling Aspirational Goals & Timelines
4. Software Accreditation

Owens Corning is a global company that develops and produces insulation, roofing, and fiberglass composites. Headquartered in Toledo, Ohio, it was formed in 1935 as a partnership between two major American glassworks, Corning Glass Works and Owens-Illinois. The company employs approximately 20,000 people around the world. A Fortune 500® company for 64 consecutive years, the company develops solutions that save energy and improve comfort in commercial, industrial, and residential buildings. Through its glass reinforcements business, Owens Corning makes thousands of products lighter, stronger and more durable. The ENERGY STAR program and similar above code programs are consistent with our corporate [sustainability mission](#) of shrinking our footprint and increasing our handprint.

Ensuring the Integrity of the ENERGY STAR Brand

We compliment EPA for exploring ways to continue to elevate the ENERGY STAR brand as market conditions change. As State and local governments adopt the 2012-2018 IECC we recognize that where ENERGY STAR Certified Homes has been embraced by some builders, this voluntary program raises the bar in these markets with respect to building and inspection practices. This has a positive ripple effect with respect to driving enhanced code compliance. Further, as stretch and certain State codes exceeding the IECC begin to approach the criteria in ENERGY STAR Certified Homes baseline, EPA needs to look at enhancing the program's energy efficiency and related requirements. This need for improvement also applies to the very critical quality assurance and verification aspects the program. Without a credible and continually improving verification component, the program could become vulnerable to unintended abuse which could negatively impact the ENERGY STAR brand. Competition supports market transformation, and this should apply to quality assurance and verification in the ENERGY STAR program as well.

Establishing a Level Playing Field

Owens Corning supports EPA expanding the number of entities capable of being a VOO provided that a level playing field on eligibility of VOOs is established. We do not support a scenario where eligibility is based on either an organization 1) being a non-profit or 2) earning 17065-accreditation as this not fair. It's our view that the tax status of an organization is irrelevant and all that matters should be performance. When governments

limit participation in programs to solely non-profits, it limits choice and competition and we do not believe this is in the tax payers or rate payers interests. We believe that allowing competition will allow all entities to compete fairly and help bring about incremental improvement in the ENERGY STAR program while also protecting the legacy and integrity of the brand.

Signaling Aspirational Goals & Timelines

It's not uncommon for the market to perceive updates to ENERGY STAR as disruptive. At the time, the thermal by-pass checklist and the addition of the HVAC checklists caused angst in the market, but both were appropriate improvements and needed. Thus, it may be time to update the requirements for VOOs. If EPA wants to require all organizations to be 17065-accredited as a condition of eligibility, it could signal this intention to phase this in over a defined period. In the first phase, EPA can give VOOs the opportunity to demonstrate compliance with the spirit and intent of the 17065 objectives. EPA could test this over a reasonable period that enables VOOs to ramp up and integrate new practices, and EPA could use some type of criteria to measure and validate adherence to 17065. In the second phase, after evaluating the uptake of 17065-accreditation, EPA can again consider requiring active or prospective VOOs to obtain 17965-accreditation by an independent accreditation agency. Such an approach would clearly signal EPA's aspirational goal of moving to a more verbose verification model, and it would treat all organizations equally, judging them on competence and performance. This might allow EPA to thread the needle between continuing to improve the program while creating a glide path for the established structure and new players to adapt to that future state.

Software Accreditation

The process by which software is to be accredited must be open, transparent, based on credible industry standards, and absent undue influence and bias. EPA should study and seek further input on whether there is merit to decoupling the approval of software from the VOOs that oversee their certification. If EPA intends to adopt the proposed criteria for accredited software, we suggest that at a minimum, EPA also should consider adding U.S. Department of Energy (DOE) approved energy modeling software programs as being eligible for modeling ENERGY STAR Certified Homes. Such a policy would align with DOE's approval of energy modeling software programs used to verify compliance with the energy efficiency requirements for the federal tax credit.

While we respect that other parties that are directly and materially affected by EPA's program rules may have more standing than product and equipment manufacturers, we're nonetheless impacted when there is not a level playing field in the market with respect to inspections and testing, VOOs, and how software treats individual measures and combination of measures in a home. It's due to this fact that we offer our views on the proposed VOO rules.

In closing, ENERGY STAR certified homes is a powerful brand and highly sought after by consumers. We appreciate that EPA is always looking at making improvements to the program to keep pace with code minimums and voluntary market drivers embracing zero-energy, Passive House, low-carbon, and other above code initiatives. Thank you for this opportunity to offer comment on this critically important voluntary program.

Thanks for leading!

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