



TO: U.S. Environmental Protection Agency

FROM: RESNET

DATE: May 10, 2019

RE: Response to Comments on ISO/IEC 17065 Verification Oversight and new 60-day stakeholder review period

RESNET Opening Statement:

Since 1996, RESNET has provided the third party verification for the ENERGY STAR Certified Homes Program with huge success which has benefited builders, EPA and the RESNET community. This has been a seamless process for builders, raters and consumers. Builders are willing to pay once for a HERS rating that comes with an ENERGY STAR certification for their homes.

RESNET Response to Eligibility Criteria for VOOs:

Overall, RESNET does not object to adding ISO/IEC 17065 certification as an eligibility option for an organization to become a VOO. Furthermore, RESNET strongly supports the requirements in Section 2 for VOO's to have demonstrated experience in providing ERI scores; a broad network of geographically dispersed verifiers and a quality assurance and oversight mechanism for verifiers.

RESNET Response to Roles and Responsibilities for VOOs:

RESNET strongly supports the requirement in Section 1 requiring VOOs to have publicly available information about the certification program. This is critically important for the transparency of the industry and comparing the quality of certification programs.

RESNET also strongly supports all the requirements in Section 2 "VOO Responsibilities". Maintaining not only high standards, but also consistent standards for verifier training and credentialing, accredited software, sampling protocols and quality assurance is paramount to a strong home energy rating industry.

RESNET believes that a strong quality assurance program is the backbone of this industry. HERS Raters are not required to be licensed by any states, which means that quality assurance oversight provides accountability within the industry. Allowing a new VOO to provide an inferior quality assurance program could water-down the value of an ENERGY STAR certified home thereby creating a race to the bottom that will result in

distrust among the builders that are paying for the certifications as well as the consumers buying the homes.

RESNET also supports the requirement that VOOs maintain a database of homes and dwelling units that are certified ENERGY STAR. Not only does this assist with understanding the energy efficient features of ENERGY STAR certified homes and dwelling units, but it also allows certification data to be more easily shared with the real estate industry and be valued within the real estate transaction process.

For the public trust, and to maintain the credibility of ENERGY STAR it is absolutely critical that EPA ensures a level playing field and the operations of any other VOO meet the same level of standards and operations as RESNET currently does.