



# ENERGY STAR SFNH Version 3.2 and MFNC Version 1.2 – Draft 2 Stakeholder Comment Form

Please submit written comments to [energystarhomes@energystar.gov](mailto:energystarhomes@energystar.gov) no later than April 15, 2022, using this template. Please note that all submitted comments will be posted on the ENERGY STAR website.

**Organization Name:** Alliance to Save Energy

**Respondent Last Name:** Leos

**Respondent First Name:** Olivia

**Comments:**

1) [Do you have feedback on the revised thermal backstop contained in Draft 2?](#)

The Alliance thanks the EPA for its rigorous focus on SFNH 3.2 and MFNC 1.2. Energy efficiency in new home construction is important and essential to overall carbon reduction goals, energy savings, and consumer energy affordability, and if not solved now, will seal in decades of energy waste and higher energy costs. The residential built environment equals 20% of all U.S. carbon emissions and according to the U.S Energy Information Administration (EIA) consumers paid \$1,409.52 in energy costs annually in 2021. By forwarding strong efficiency standards through SFNH 3.2 and MFNC 1.2, consumers will be better aligned to save on energy costs, up to 10% of their energy bill, and create a pathway for energy savings and carbon reduction.

In October 2021, EPA released its ENERGY STAR Residential New Construction Program Roadmap, which sought to expand the ENERGY STAR Residential New Construction programs through three important proposals, (1) transitioning all states where ENERGY STAR SFNH Version 3.0 is still in effect to Version 3.1 and MFNC Version 1.0 to Version 1.1; (2) introducing new versions of SFNH National Version 3.2 and MFNC National Version 1.2 (promising to be at least 10% more stringent than the 2021 IECC); and (3) introducing a new companion certification label to the current ENERGY STAR program for residential new construction.

In response, some preferred a weakened mandatory building envelope requirement for the SFNH National Version 3.2 and MFNC National Version 1.2, stating that setting the 2021 IECC as the thermal backstop would be too aggressive and expensive. These advocates instead sought a thermal backstop set to the 2015 or 2018 IECC. The Alliance and others responded, concerned about the implications of a less effective thermal backstop, and provided comments in support of the proposed 2021 IECC backstop as the minimum requirement, voicing that if dropped, Energy Star would forfeit a substantial lifetime of building envelope efficiency improvements, ultimately sealing in decades of energy waste and higher energy costs.

On March 21, 2022, the EPA proposed a new version of SFNH 3.2 and MFNC 1.2, containing a revision to the proposed thermal backstop. The new proposal added a 5-year transition period toward the 2021 IECC adoption. Energy Star commented that this period would allow homes and apartments permitted before January 1, 2025, to be certified with a total building thermal envelope UA of 105% of the total UA outlined in the 2021 IECC. This addition would give the industry and market a reasonable amount of time to develop solutions to achieve the full 2021 IECC enclosure levels.

By setting the 2021 IECC as the minimum thermal requirement, after the 5-year transition period, average annual cost savings will increase by a comparative \$191/dwelling unit when compared to the 2018 IECC requirements –



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which accumulates to a life cycle cost savings of \$2,320/dwelling unit (National Cost Effectiveness of the Residential Provisions of the 2021 IECC, Pacific Northwest National Lab - June 2021). Moreover, the 2021 IECC could save states a total estimated \$74.61 billion in energy cost savings and 424.20 MMT of avoided CO2 emissions in residential buildings (cumulative 2010 through 2040), or \$3.24 billion in annual energy cost savings and 18.50 MMT in annual avoided CO2 emissions (annually by 2030) (Analysis Regarding Energy Efficiency Improvements in the 2021 International Energy Conservation Code, DOE – 2021).

The Alliance to Save Energy supports the new proposal, as it would continue to position the ENERGY STAR Residential New Construction Program as one of the most impactful volunteer programs for saving homeowners money and for meeting the administration's ambitious climate goals. At a time when energy security, costs, and climate are leading the national agenda, now is the time to push forward with higher efficiency outcomes, and greater consumer savings. We thank you for your continued leadership on these issues, and for the opportunity to provide comment.

## 2) [Do you have additional general feedback on the changes proposed in Draft 2?](#)

[Add comments]